

1 IN THE UNITED STATES DISTRICT COURT  
2

3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 JASON GOODMAN

5 Plaintiff,

6 vs.

7 CHRISTOPHER ELLIS BOUZY, BOT  
8 SENTINEL, INC, GEORGE WEBB  
9 SWEIGERT, DAVID GEORGE SWEIGERT,  
10 BENJAMIN WITTES, NINA JANKOWICZ,  
11 ADAM SHARP, MARGARET ESQUENET,  
12 THE ACADEMY OF TELEVISION ARTS  
AND SCIENCES, SETH BERLIN,  
MAXWELL MISHKIN,

13 Defendants

Case No.: 1:21-cv-10878-AT-JLC

REPLY TO DEFENDANTS' OPPOSITION  
TO PLAINTIFF'S OBJECTION TO  
ORDER AND REPORT AND  
RECOMMENDATION

14 Plaintiff Jason Goodman, by and for himself pro se, respectfully submits this reply to  
15 Defendants' opposition to the objection to the order and report and recommendation.

17 **INTRODUCTION**

18 Defendants base their opposition response on a false conclusion in which they stated,  
19 "*Plaintiff's sprawling Objections do not identify a single factual or legal error in Judge Cott's*  
*Report and Recommendation.*" This is false, Goodman objected to Judge Cott's inarguably and  
21 fundamentally false conclusion that Goodman has accused defendant Benjamin Wlettes  
22 ("Wlettes") of committing murder. Even in his follow up order (ECF No. 227) Judge Cott did not  
23 deny this false conclusion. Instead he reiterated, "*Goodman argues that I falsely stated that he*  
*accused defendant Wlettes of murder. The Court's construction of the amended complaint led it to*  
*characterize the allegations in that fashion.*" Judge Cott's conclusion in this instance violates the  
27

28 REPLY TO DEFENDANTS' OPPOSITION TO PLAINTIFF'S OBJECTION TO ORDER  
AND REPORT AND RECOMMENDATION - 1

1 principle of liberal construction of pro se pleadings. It does the opposite in fact, construing  
2 liberally in favor of the represented Defendants. It is a gross and clear error that indicates Judge  
3 Cott fundamentally misunderstands the basic facts of this case or else is otherwise deliberately  
4 ignoring and contradicting the facts to favor Defendants.  
5

6 Goodman never made the accusation that Wittes committed murder. Wittes has not  
7 attempted to defend the claim that Goodman accused him of murder. The lack of specific  
8 defense to that allegation is strong evidence that even interested parties agree Goodman did not  
9 make that claim. The fundamental basis of this case is Goodman's claim that Wittes participated  
10 in a conspiracy to conceal information about the death of political operative Peter W. Smith  
11 ("Smith"). This claim was the basis for the initial contact between Goodman and Christopher  
12 Bouzy ("Bouzy"). Goodman has not wavered from this claim. If Judge Cott's conclusion is not  
13 a clear error, it can only otherwise be a deliberate false statement. Either would be sufficient to  
14 provoke a legitimate objection. Defendants' opposition brief conspicuously seeks to deny this  
15 substantial detail, strenuously arguing that Goodman has not made a valid objection despite the  
16 clear facts. Each point in Defendants' filing is founded upon and reiterates their false assertion  
17 that Goodman has not identified any error and therefore need not be individually addressed.  
18

19 Judge Cott's statement, "*The Court's construction of the amended complaint led it to*  
20 *characterize the allegations in that fashion*" defies credulity. It should not be accepted at face  
21 value without further clarification as to what specific aspect of the amended complaint led the  
22 judge to such an erroneous conclusion. The word "murder" does not appear in the amended  
23 complaint. The specific allegation that concerns Wittes and the death of Smith is "*Defendant*  
24 *Bouzy defamed Goodman when he knowingly published false conclusory statements to third*

1 parties on Twitter declaring Goodman had falsely accused Wittes of deliberately misleading the  
2 public with regard to the death of Peter W. Smith.” (See ECF No. 100 page 38 paragraph 67).  
3

4 This case began as a result of Goodman’s accusation that Wittes lied and hid true facts in  
5 order to present a false story about the death of Smith. This prompted the interaction with Bouzy  
6 and lead to the defamatory statements and deliberate destruction of Goodman’s access to social  
7 media. Since then, each of the Defendants have filed pleadings replete with conclusory and false  
8 statements that rest on the legally meaningless and derogatory assertion that Goodman is a  
9 conspiracy theorist. A large amount of evidence is already on the record that proves Defendants  
10 were in fact engaged in a conspiracy and the Court should not ignore these facts in the way Judge  
11 Cott is attempting. On June 8, 2023, a hearing took place in the matter of Jankowicz v Goodman  
12 in Arlington Circuit Court. Defendant Nina Jankowicz (“Jankowicz”) was cross examined in the  
13 matter and perjured herself repeatedly. Jankowicz’ testimony was rife with contradictory and  
14 false statements which, once reviewed by the Court will prove self-evident. (**EXHIBIT A**)  
15

16 These Defendants must not be permitted to lie their way out of this legal action. Each of  
17 Goodman’s well-founded claims are backed by evidence that Defendants cannot refute. Instead,  
18 they choose to deny empirical facts and ignore reality in favor of their own fiction. If the Court  
19 intends to serve justice in this matter, these facts must be evaluated before Goodman’s claims  
20 can be dismissed and certainly before the draconian injunctions recommended by Judge Cott and  
21 supported by Defendants’ dishonest motion can be imposed. Judge Cott has recommended an  
22 outrageous and unjust infringement on Goodman’s rights to report facts and evidence relevant to  
23 historical matters and of unquestionable public interest. He has further recommended denying  
24 Goodman’s fundamental right to access the courts and these actions at least appear to be unjustly  
25

26 REPLY TO DEFENDANTS’ OPPOSITION TO PLAINTIFF’S OBJECTION TO ORDER  
27 AND REPORT AND RECOMMENDATION - 3  
28

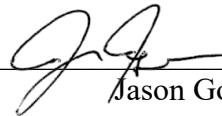
1 calculated in favor of Defendants. Basing any injunctive action of a false assessment of  
2 Goodman's claims would be antithetical to the service of justice and must not be allowed.  
3

4 **CONCLUSION**  
5

6 Goodman prays the Court will convene a hearing at which Defendants can answer  
7 to this evidence with relevant countering facts and arguments stronger than juvenile insults  
8 or derisive, fallacious claims of so-called conspiracy theory. For the reasons stated herein, the  
9 Court should deny Defendants' motion and sustain Goodman's objection to the entirety of Judge  
10 Cott's outrageous and fundamentally flawed Order and Report and Recommendation. Goodman  
11 reiterates his request for relief by disqualification of Judge Cott for incompetence relative to  
12 these facts or otherwise deliberate and unjust favoritism towards Defendants, and any other relief  
13 as determined by the Court.

14  
15 Signed this 19<sup>th</sup> day of June 2023

16 Respectfully submitted,  
17



18 Jason Goodman, Plaintiff, Pro Se  
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20 New York, NY 10001  
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**(EXHIBIT A)**

# COPY

1

**V I R G I N I A**

IN THE CIRCUIT COURT OF ARLINGTON COUNTY

4 NINA JANKOWICZ

5 | Partition

6 -VS- :  
:

7 || Page

JASON GOODMAN,

Respondent.

II

Circuit Courtroom 11A  
Arlington County Courthouse  
Arlington, Virginia

Thursday, June 8, 2023

CM23A041

1 APPEARANCES:

On Behalf of the Petitioner:

Veronica Holmes, Esq.  
THE GELLER LAW GROUP, PLLC  
4000 Legato Road  
Suite 1100  
Fairfax, VA 22033

On Behalf of the Respondent:

JASON GOODMAN, PRO SE

\* \* \* \*

## C O N T E N T S

12 WITNESSES DIRECT CROSS REDIRECT REBROSS

13 NINA JANKOWICZ 10 32 - -

14 JASON GOODMAN 56 67 -

15 DET. JOHN ADAMS 79 83 -

1 C O N T E N T S  
2

3	EXHIBITS	MARKED	RECEIVED
4	PETITIONER'S EXHIBIT NO. 1A, 1B	13	15
5	PETITIONER'S EXHIBIT NO. 2A, 2B	13	15
6	PETITIONER'S EXHIBIT NO. 3	16	27
7	PETITIONER'S EXHIBIT NO. 5	-	29
8	PETITIONER'S EXHIBIT NO. 6	-	29
9	PETITIONER'S EXHIBIT NO. 7	-	30
10	PETITIONER'S EXHIBIT NO. 8	13	31
11	PETITIONER'S EXHIBIT NO. 9	17	31
12	PETITIONER'S EXHIBIT NO. 10	23	24
13	PETITIONER'S EXHIBIT NO. 11	71	-

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1 P R O C E E D I N G S

2 (The Court Reporter was sworn by the Clerk  
3 of the Court.)

4 THE COURT: Good morning. All right, so  
5 are we ready for trial this morning?

6 MS. HOLMES: Yes, Your Honor.

7 MR. GOODMAN: Yes, Your Honor.

8 THE COURT: All right. Are there any  
9 preliminary matters that -- at this time, I think I'll  
10 have you go ahead and introduce yourself. Now that we're  
11 back on the record, can I have everyone introduce  
12 themselves for the record?

13 MS. HOLMES: Good morning, Your Honor.

14 Veronica Holmes, counsel for Petitioner Nina Jankowicz.

15 THE COURT: Okay.

16 MR. GOODMAN: Jason Goodman, pro se, Your  
17 Honor.

18 THE COURT: All right.

19 MS. HOLMES: And then Nina Jankowicz is  
20 also here.

21 THE COURT: All right. Are there any  
22 preliminary matters that we need to take up before we go  
23 ahead and begin the trial?

1 MS. HOLMES: Your Honor, I don't believe  
2 there are any, just the request that Mr. Goodman, while  
3 he is permitted to have his laptop in the courtroom, that  
4 he does not live stream or record this hearing.

5 THE COURT: Yes. Mr. Goodman, the Court  
6 does not allow hearings to be recorded or live streamed,  
7 so please make sure -- I allowed you to have your  
8 computer in so you could have access to any exhibits or  
9 other evidence that you needed.

10 MR. GOODMAN: Think you, Your Honor. I  
11 have read the order, and I have no intention of doing  
12 anything like that.

13 THE COURT: All right, well, I accept you  
14 at your word for that. All right --

15 MR. GOODMAN: Your Honor --

16 THE COURT: Yes, sir?

17 MR. GOODMAN: With regard to preliminary  
18 matters, if there is evidence that I want to show, will  
19 that happen during the course of the trial, or should we  
20 do that as a preliminary matter?

21 THE COURT: So any evidence that you want  
22 to present to the Court, you can present during the  
23 course of the trial. And the way that the trial will

1 proceed is I will allow each party to make an opening  
2 statement, if you would like. And it would be helpful  
3 for me just to get at least a little sense of what you  
4 both think this case is about, because I don't have very  
5 much information. And then, as it is Ms. Jankowicz's  
6 motion, you can present whatever evidence that you would  
7 like to present.

8 You would have the opportunity, sir, to  
9 cross-examine any witnesses who are called, and then once  
10 she rests, to the extent that you have testimony or  
11 evidence that you want to present, you are certainly able  
12 to do that, and obviously, if you testify, counsel would  
13 be able to cross-examine you regarding your testimony.

14 Once all the testimony and evidence is  
15 presented, then I will give each party, if they wish, the  
16 opportunity to make a closing argument. And at that  
17 point, I may need to take a little bit of time just to  
18 consider the evidence, and I'll come back and give you my  
19 ruling. All right?

20 MR. GOODMAN: Thank you.

21 THE COURT: All right, so, Counsel, why  
22 don't you go ahead and start?

23 MS. HOLMES: Good morning, Your Honor,

1 | Veronica Holmes on behalf of Ms. Jankowicz.

2 Ms. Jankowicz is here today seeking that  
3 the protective order issued by the General District Court  
4 on February 14th, 2023, is upheld for the full two-year  
5 time period.

6 Evidence will show that Ms. Jankowicz has  
7 been repeatedly harassed and living under constant threat  
8 of release of her personal information by Mr. Goodman for  
9 almost a year now. You would hear evidence that on  
10 January 4, 2023, Mr. Goodman's Twitter account was locked  
11 for violating Twitter's doxxing policy due to posting a  
12 video containing Ms. Jankowicz's personal information.

13 As a result, Mr. Goodman contacted Ms.  
14 Jankowicz over six times over the course of two days and  
15 filed a lawsuit against her requesting that the complaint  
16 be removed.

17                                  You will hear testimony that Mr. Goodman  
18 believes Ms. Jankowicz is a criminal and should be  
19 shunned from society. You will hear testimony that he  
20 has called her then unborn child demon spawn, and  
21 suggested that she should have an abortion. And for  
22 these reasons, Ms. Jankowicz requests that the protective  
23 order is upheld.

1                   THE COURT: All right. Mr. Goodman, any  
2 opening?

3                   MR. GOODMAN: Good morning, Your Honor.  
4 Jason Goodman, pro se. I am a journalist and documentary  
5 filmmaker, and I had no knowledge of Ms. Jankowicz prior  
6 to about April 25, 2022, when it was publicly announced  
7 by the Department of Homeland Security that she would be  
8 the director of a new Disinformation Governance Board,  
9 and Ms. Jankowicz became a nationally recognized public  
10 figure when she appeared on several news broadcasts  
11 announcing the plan to determine which statements made by  
12 American citizens, despite being lawful, Ms. Jankowicz  
13 might find awful, and therefore deem disinformation.

14                  Ms. Jankowicz has made a number of false  
15 statements to the Arlington Police and to the Arlington  
16 General District Court in order to obtain a preliminary  
17 protective order against me, and she opportunistically  
18 served me with a summons after making a false statement  
19 to the Court, when she learned through civil litigation  
20 that I would not be at my home in New York for an  
21 extended period of time.

22                  So I was served in absentia and almost  
23 entirely missed the hearing. I was blindsided in that

1 hearing, and I would like to present evidence today that  
2 proves that Ms. Jankowicz has made deliberate false  
3 statements with the intent of silencing me, denying me my  
4 First Amendment rights, and denying me the ability to  
5 investigate what I believe are illegal activities being  
6 engaged in by the Department of Homeland Security and Ms.  
7 Jankowicz, and I believe she is continuing those today.  
8 Thank you, Your Honor.

9 THE COURT: All right. Counsel, who is  
10 your first witness?

11 MS. HOLMES: My first witness is Nina  
12 Jankowicz, Your Honor.

13 THE COURT: All right. Ma'am, I'm going  
14 to ask you to come up here to the witness stand.

15 MS. HOLMES: And, Your Honor, I have a  
16 number of Exhibits. Is it okay --

17 THE COURT: Just one second. If you would  
18 just stand and raise your right hand.

19 (The Witness was duly sworn by the Clerk  
20 of the Court. )

21 THE COURT: All right, go ahead, Counsel.  
22 I'm sorry.

23 MS. HOLMES: I just have a number of

10

1 exhibits. Is it okay if I move out of the well to --

2 THE COURT: Yes, you can approach the  
3 witness and show them to her.

4 MS. HOLMES: Thank you, Your Honor.

5 Whereupon

6 NINA JANKOWICZ

7 the Petitioner, was called for examination by counsel on  
8 behalf of the Petitioner, and having been duly sworn by  
9 the Clerk of the Court, was examined and testified as  
10 follows:

11 DIRECT EXAMINATION

12 BY MS. HOLMES:

13 Q Can you please state your full name and  
14 zip code for the record?

15 A My name is Nina Jankowicz, and I reside in  
16 Arlington, 22204.

17 Q How do you know the Respondent?

18 A I had no knowledge of Mr. Goodman until he  
19 contacted me in May of 2022. As Mr. Goodman somewhat  
20 incorrectly stated, and in fact, has lied already today,  
21 I was appointed by the administration in March of 2022 to  
22 lead the Disinformation Governance Board.

23 The Board was announced on April 27th. It

1 met some backlash from many people in the United States,  
2 and Mr. Goodman contacted me in May of 2022 in a phone  
3 call that he recorded without my knowledge or consent.

4 I told him I was not giving interviews at  
5 the time. Again, another fraudulent statement he has  
6 made this morning. I didn't have any interview during  
7 the time I was executive director, because I was  
8 prohibited from doing so.

9 Mr. Goodman then released a phone call to  
10 his followers online and proceeded to call me. I asked  
11 him to stop calling me, and in the time between May and  
12 when I sought this protective order on January 5, 2023,  
13 he referenced me in over 50 of his broadcasts and tweeted  
14 me -- tweeted about me numerous times.

15 He also released my personal information  
16 in videos -- in one video that is posted to Alex Jones'  
17 Banned.Video platform on Infowars, in which Mr. Goodman  
18 scrolls past an archived version of a website that  
19 includes my home address, my in-laws' address, and as my  
20 counsel has already stated, he has defamed and threatened  
21 me.

22 He threatened my then unborn child. He  
23 has been curious to see my unborn child, and he has a

1 history of showing up at the addresses and places of work  
2 of people that he is, quote, unquote, investigating.

3 I do not believe that Mr. Goodman's  
4 activities have any journalistic purpose. His purpose is  
5 to threaten people and monetize that threatening of  
6 people, and it should be said that I have been  
7 threatened, defamed, harassed by tens of thousands of  
8 people in the past year, and I only sought one protective  
9 order. And that is against Mr. Goodman.

10 Q What incident caused you to initially seek  
11 the protective order?

12 A As I said, Mr. Goodman had been talking  
13 about me on his channels for six months, and in January,  
14 I decided to seek the protective order after Mr. Goodman  
15 began calling me again with this allegation that I  
16 somehow had some hand in shutting down his Twitter  
17 account, when no such thing happened.

18 He, again, called me multiple times,  
19 threatening frivolous legal action, and I decided to seek  
20 a protective order after that.

21 Q And what was the -- do you remember the  
22 name of the video that he posted on that January 4th,  
23 2023, post?

13

1 A I believe this was the Disinfo Diva video,  
2 which alleges that I am some sort of double agent in a  
3 crazy conspiracy theory that I can't even follow.

4 MS. HOLMES: Your Honor, I have marked the  
5 video as Petitioner's Exhibit 8. I'm not going to be  
6 showing it today, because it is about two hours long, but  
7 I do have a USB for the Court to enter into evidence.  
8 But I'm marking it as Exhibit 8.

THE COURT: Exhibit 8 or A?

10 MS. HOLMES: Exhibit 8.

THE COURT: 8, okay.

12 (The above-referenced  
13 document was marked  
14 Petitioner's Exhibit No. 8  
15 for identification.)

16 BY MS. HOLMES:

17 Q And then you referenced a few emails that  
18 you received from him the following day, so I have  
19 Plaintiff's Exhibit 1A and 1B, and then 2A and 2B.

20 (The above-referenced  
21 documents were marked  
22 Petitioner's Exhibit Nos.  
23 1A, 1B, 2A, 2B

14

1 respectively, for  
2 identification.)

3 MR. GOODMAN: Am I allowed to object?

4 THE COURT: So she hasn't moved them into  
5 evidence yet, so --

6 MR. GOODMAN: Okay.

7 MS. HOLMES: Your Honor, here is a copy  
8 for you.

9 BY MS. HOLMES:

10 Q Can you please identify what is in front  
11 of you?

12 A Yes, these are emails that Mr. Goodman  
13 began sending me after he called me multiple times in  
14 early January, again, threatening frivolous legal action,  
15 alleging that I had some hand in removing his Twitter  
16 account, and yeah.

17 MS. HOLMES: Your Honor, this is 1A and  
18 1B.

19 THE COURT: All right.

20 BY MS. HOLMES:

Q Is this a true and accurate representation  
of the emails that you received?

23 A Yes.

1 MS. HOLMES: Your Honor, I would like to  
2 admit Plaintiff's Exhibit 1A, 1B, 2A, and 2B into  
3 evidence.

4 THE COURT: Any objection, Mr. Goodman?

5 MR. GOODMAN: 2B and 2A? I only have 1B  
6 and 1A. And I don't have the video.

7 MS. HOLMES: I haven't admitted that into  
8 evidence yet.

9 MR. GOODMAN: No objections, Your Honor.

10 THE COURT: All right, so Plaintiff's  
11 Exhibit 1A, 1B, 2A, and 2B will be admitted without  
12 objection.

13 (Petitioner's Exhibit Nos.  
14 1A, 1B, 2A, and 2B were  
15 received in evidence.)

16 BY MS. HOLMES:

17 Q Has Mr. Goodman released your personal  
18 information in any other posts?

19 A Yes, prior to the protective order hearing  
20 that was held on February 14th, he waved a copy of the  
21 preliminary protective order in front of the camera that  
22 had my date of birth.

23 MS. HOLMES: Your Honor, I've marked

1 Petitioner's Exhibit 3.

2 (The above-referenced  
3 document was marked  
4 Petitioner's Exhibit No. 3  
5 for identification.)

6 THE COURT: All right.

7 BY MS. HOLMES:

8 Q Can you please identify Petitioner's  
9 Exhibit 3?

10 A Yes, this is a screenshot from Mr.  
11 Goodman's YouTube video that he uploaded prior to the  
12 February 14, 2023, hearing. It's blurry in this video in  
13 this screenshot, but you can absolutely make out my date  
14 of birth when you are watching it in HD on YouTube, which  
15 is what I did prior to coming to court on February 14.

16 Q Have there been any threats made against  
17 you or your child?

18 A As we discussed earlier, Mr. Goodman has  
19 said that he believes I committed treason and should be  
20 put in jail. He has said that my child should be put in  
21 a separate jail. He has said that I should get an  
22 abortion, which I also consider a threat.

23 He has, again, expressed skepticism that

1 my child even exists, because due to the threats to my  
2 family, I have not posted pictures of my child online.  
3 And this makes me worry that he might show up to live  
4 stream images of my child, which again, he has a history  
5 of doing. He does this in the course of his live streams  
6 fairly frequently.

15 So certainly the folks that follow Mr.  
16 Goodman and watch the content that he creates are  
17 violent.

18 Q And was that conspiracist man's name Mike  
19 Rockstone?

20 A Yes.

MS. HOLMES: Your Honor, I have a demonstrative marked as Exhibit 9.

23 (The above-referenced

1 document was marked  
2 Petitioner's Exhibit No. 9  
3 for identification.)

4 THE COURT: All right.

5 BY MS. HOLMES:

6 Q Do you have Petitioner's Exhibit 9 in  
7 front of you?

8 A I do.

9 Q And is this a demonstrative containing  
10 quotes and time stamps of various videos that Mr. Goodman  
11 has posted and statements that he has made?

12 A Yes, and I have also added the video that  
13 is referenced in Exhibit 3. He called me a dumb bitch.

14 Q Okay. Can you please refer to Exhibit 5,  
15 Sunday with Charles, as the title of the video?

16 A Yes.

17 Q Can you please read 5A?

18 A She's trying to destroy the Constitution.  
19 I now have reason to believe that she had a role to play  
20 in destroying my property, which is this YouTube channel  
21 Crowdsource the Truth Five, and I'm going to continue  
22 looking into what she thinks she's going to be able to do  
23 relative to the Constitution.

1 Q What is Crowdsource the Truth Five?

2 A It is one of the many YouTube channels  
3 that Mr. Goodman has. He has had to make multiple of  
4 them, because he has had multiple terms of service  
5 violations that have caused YouTube to remove his  
6 channels.

7 Q Can you please read the quote of Exhibit  
8 5B?

9 A I'm convinced this woman has criminal  
10 conflicts of interest, and they need to come out, and I  
11 hope she gets prosecuted, and her and her baby in jail.  
12 Well, the baby doesn't need to go to jail. Put her in  
13 jail before she has the baby. That will be pleasant for  
14 her.

15 And I should mention, Your Honor. I  
16 forgot if I mentioned it before, that while all this was  
17 initially going on in May, I was heavily pregnant. I was  
18 weeks away from giving birth to my first child.

19 Q Please refer to Exhibit Number 6. The  
20 title is "Is Nina Jankowicz the Most Dangerous Woman in  
21 America, with special guest Lee Stranahan."

22 Can you please read the quote of Exhibit  
23 6A?

1           A       Doesn't baby need attention. Why doesn't  
2 she get an abortion. They seem to want everyone else to  
3 do that, get an abortion, do this job.

4           Q       Can you please refer to Exhibit 6B?

5           A       How do you get your name and information  
6 redacted from public records and property sales  
7 databases.

8           Q       Can you please read Exhibit 6C?

9           A       This alleged husband of hers is a virtual  
10 Internet ghost.

11          Q       Can you please read Exhibit 6D?

12          A       She is 33. Do people know that?

13          Q       Can you please read Exhibit 6E?

14          A       She needs to be shunned from society,  
15 never hired for anything, and I'm sad to know that she is  
16 reproducing more assholes in the world.

17          Q       Can you please read what is marked as  
18 Exhibit 7, Charles Orwell is Closing In - Tweetbot  
19 Monsters title? Can you please read Exhibit 7A?

20          A       Where is the demon spawn. It should pop  
21 out soon. I am disappointed when losers and criminals  
22 procreate.

23          Q       Can you please read Exhibit 7B?

1           A         We've got to make sure she's not allowed  
2 to hold any office in government, any position of  
3 importance, and she should be held accountable for these  
4 IC crimes. The evidence that I have seen in the public  
5 domain indicated that crimes are being committed.

6           Q         Do you believe that if the protective  
7 order were removed, Mr. Goodman would leave you alone and  
8 stop contacting you?

9           A         No, I do not. He has made clear, again,  
10 in the civil litigation that he has named me, and that he  
11 will continue attempting to harass and, quote, unquote,  
12 hold me to justice until he dies. He said that in a  
13 recent video.

14          Q         How has this impacted your immediate and  
15 larger family?

16          A         So I would say first and most importantly,  
17 during the first year of my son's life, we have been  
18 denied peace of mind. Obviously, I have been a target of  
19 widespread nationwide harassment, but Mr. Goodman  
20 repeatedly sharing videos on Alex Jones' website where  
21 individuals who have, you know, persecuted and harassed  
22 the families of Sandy Hook and regularly watch videos has  
23 made us had to change our entire security posture in our

1 home.

2                   And again, I worry that, you know, when I  
3 take my son to daycare in the morning, or when we go out  
4 for a walk that Mr. Goodman might be there live  
5 streaming. I worry that when I do speaking engagements  
6 that he might show up and threaten me, and I worry the  
7 same about his followers.

8                   So I don't believe that if this protective  
9 order were lifted that he would stop contacting me. He  
10 has made that clear.

11                  My broader family, you know, he remarked  
12 in Exhibit 9 that my husband is a virtual Internet ghost.  
13 My husband has had to fully withdraw from public life  
14 because of Mr. Goodman's behavior, because of his  
15 investigations into me and my family. My husband has no  
16 role in my work. I don't see why he should be  
17 investigated by anyone who deems himself a, quote,  
18 unquote, journalist, like Mr. Goodman.

19                  Mr. Goodman has also shared the home  
20 address of my in-laws in the video that is on Alex Jones'  
21 Infowars platform. And as a result, I would say that,  
22 again, we have lost peace of mind. We do not feel  
23 secure, and I don't believe that anybody should have to

1 go through this simply for the act of having taken a job  
2 in their area of expertise to serve their country.

3 MS. HOLMES: And regarding Mr. Goodman's  
4 prior acts towards other people appearing at his home,  
5 Your Honor, I have marked Petitioner's Exhibit 10.

6 (The above-referenced  
7 document was marked  
8 Petitioner's Exhibit No.  
9 10 for identification.)

10 THE COURT: All right.

11 BY MS. HOLMES:

12 Q Can you identify Exhibit 10?

13 A Yes, this is a podcast transcript from --  
14 a transcript of a podcast done by NBC News that looks at  
15 how individuals, including Mr. Goodman, have  
16 conspiracized about the health and well-being of the  
17 nurse in Chattanooga, Tennessee, that received the COVID  
18 shot and then fainted.

19 People conspiracized that she died, and  
20 Mr. Goodman went to Chattanooga, Tennessee, to stand in  
21 front of the hospital where this woman worked, and  
22 essentially harass her in much the same way that he has  
23 been doing to me over the past year.

1 Q And can you please read the highlighted  
2 portions on page 10 -- I mean, 11 and 12?

3 A Sure.

4 THE COURT: Counsel, are you moving this  
5 into evidence?

6 MS. HOLMES: Yes, I will be, Your Honor.

7 THE COURT: Well, she can't read from it  
8 until it's in evidence. So are you moving it into  
9 evidence?

10 MS. HOLMES: Yes, Your Honor. I'd like to  
11 admit Exhibit 10 into evidence.

12 THE COURT: Any objection, Mr. Goodman?

13 MR. GOODMAN: No.

14 THE COURT: All right, Plaintiff's Exhibit  
15 10 will be admitted without objection.

16 (Petitioner's Exhibit No.

17 10 was received in  
18 evidence.)

19 THE WITNESS: So page 11, people might  
20 find this crazy, but I'm in Chattanooga, Tennessee, and  
21 I'm standing in front of the CHI Memorial Hospital. I  
22 just -- I was here to follow up on a story people might  
23 recall.

1                   And then on page 12, I just followed some  
2 directions, went to the information desk. Security guy  
3 basically told me to get the hell out of here.

4                   BY MS. HOLMES:

5                   Q         What has taken place following the  
6 issuance of the protective order on February 14, 2023?

7                   A         Mr. Goodman has not contacted me. He has  
8 not directly mentioned me on social media profiles,  
9 although he has alluded to me on several occasions. And  
10 the harassment stopped.

11                  Q         Has Mr. Goodman discussed the protective  
12 order online following the issuance of it?

13                  A         Only in allusions. He has not directly  
14 referenced it, but he has kind of referenced his right to  
15 carry a firearm having been taken away, and his general  
16 objection to the protective order.

17                  Q         Do you believe that Mr. Goodman is a  
18 danger to your family?

19                  A         I don't believe that Mr. Goodman would  
20 hurt me or my family directly, but I do believe he will  
21 continue harassing me. I do believe he will continue  
22 sharing my personal information with his followers, who  
23 as I've noted, have made direct threats to me and my

1 family.

2 Q Are you seeking a continuance of the two-  
3 year protective order?

4 A Yes.

5 Q Are you seeking that Mr. Goodman has no  
6 contact with you directly, indirectly, through any third  
7 party, or by any electronic means, including social  
8 media, email, and texts?

9 A Yes.

10 Q Are you seeking that Mr. Goodman is  
11 required to stay at least a hundred feet away from you at  
12 all times?

13 A Yes.

14 Q Are you seeking that Mr. Goodman is  
15 required to stay at least a hundred feet away from your  
16 home at all times?

17 A Yes.

18 Q Are you seeking that Mr. Goodman is  
19 required to stay at least a hundred feet from your work  
20 place at all times?

21 A Yes.

22 Q Thank you.

23 MS. HOLMES: Your Honor, I would like to

1 admit Exhibit Numbers 5, 6, 7, and 8 into evidence. They  
2 are all videos, and I have a USB for you. And I also  
3 have time stamps on the demonstrative exhibit just  
4 introduced for demonstrative purposes in order to help on  
5 the videos.

6 THE COURT: So you're not admitting  
7 Exhibit 3?

8 MS. HOLMES: Yes, I believe -- yes, Your  
9 Honor, I would like to request that Exhibit 3 is admitted  
10 into evidence as well.

11 THE COURT: Do you have any objection, Mr.  
12 Goodman, to Exhibit 3 being admitted, which was the  
13 screenshot of the video?

14 MR. GOODMAN: I have no way of looking at  
15 them or verifying --

16 THE COURT: Well, this is Exhibit 3.

17 MR. GOODMAN: Well, yes, that -- I thought  
18 you were talking about the videos.

19 THE COURT: I haven't gotten to those yet.

20 MR. GOODMAN: Sorry, no objection.

21 THE COURT: All right. So Exhibit 3 will  
22 be admitted without objection.

23 (Petitioner's Exhibit No. 3

1 was received in  
2 evidence.)

3 THE COURT: Then I'm sorry, then you had a  
4 number of videos, Counsel. So what are those?

5 MS. HOLMES: Exhibit Numbers 5, 6, 7, and  
6 8.

7 THE COURT: And what are those?

8 MS. HOLMES: These are videos that Mr.  
9 Goodman recorded and posted online on various websites.  
10 They are currently on the IC now because they have been  
11 taken down from YouTube and Twitter and places like that.

12 I have them downloaded and saved onto a  
13 USB, but I can also play them for the Court if Mr.  
14 Goodman would like to verify.

15 THE COURT: Well, in order for him to know  
16 whether he is objecting, I guess he needs to see them.  
17 So how long are they?

18 MS. HOLMES: They are very long, Your  
19 Honor, but I can just play the bit with him talking in  
20 the beginning for him to verify.

21 | This is Exhibit 5, Your Honor.

22 (Video recording played.)

23 MS. HOLMES: Any objection? I'm sorry --

1 MR. GOODMAN: No, that's fine.

2 THE COURT: So what number is that?

3 MS. HOLMES: That is Exhibit 5, Your  
4 Honor.

5 THE COURT: So there is no objection to  
6 Exhibit 5?

7 MR. GOODMAN: No, Your Honor.

8 THE COURT: All right. Then that will be  
9 admitted without objection, for the record.

10 (Petitioner's Exhibit No. 5  
11 was received in evidence.)

12 MS. HOLMES: This is Exhibit 6, Your  
13 Honor.

14 (Video recording was played.)

15 MS. HOLMES: This is Exhibit 6, Your  
16 Honor.

17 THE COURT: Any objection?

18 MR. GOODMAN: No, Your Honor.

19 THE COURT: All right, Exhibit 6 will be  
20 admitted without objection.

21 (Petitioner's Exhibit No. 6  
22 was received in evidence.)

23 (Video recording played.)

1 MS. HOLMES: This is Exhibit 7, Your  
2 Honor. There was a timestamp for the relevant portion  
3 and quotes.

4 THE COURT: Do you want to put that back  
5 up so he can see it?

6 MS. HOLMES: Do you want it with the exact  
7 quotes for Exhibit 7?

8 MR. GOODMAN: It's a video of me. It's  
9 fine, no objection.

10 THE COURT: Okay, no objection to Number  
11 7.

12 (Petitioner's Exhibit No. 7  
13 was received in evidence.)

14 MS. HOLMES: And this is Exhibit 8, Your  
15 Honor.

16 (Video recording played.)

17 MR. GOODMAN: Could you please advance to  
18 55 minutes in this video?

19 MS. HOLMES: No, I'm just showing it for  
20 you to verify.

21 MR. GOODMAN: Okay, yeah, let's put it in,  
22 please.

23 THE COURT: All right, so that will be

1 admitted without objection.

2 (Petitioner's Exhibit No. 8  
3 was received in evidence.)

4 MS. HOLMES: Thank you, Your Honor.

5 THE COURT: And then were you also moving  
6 Exhibit 9 as a demonstrative?

7 MS. HOLMES: Yes, Your Honor.

8 THE COURT: Any objection to Exhibit 9,  
9 which was the excerpts?

10 MR. GOODMAN: No objection, Your Honor. I  
11 have one question. Can you please tell me the total run  
12 time of this video?

13 MS. HOLMES: This run time is an hour and  
14 28 minutes, and 43 seconds.

15 MR. GOODMAN: Thank you.

16 THE COURT: All right. So no objection to  
17 Exhibit 9, which is the demonstrative.

18 MR. GOODMAN: Correct.

19 THE COURT: All right, that will be  
20 admitted without objection.

21 (Petitioner's Exhibit No. 9  
22 was received in evidence.)

23 THE COURT: And then I already admitted

1 Number 10, which was the podcast.

2 All right. Are you done with your  
3 examination at this point?

4 MS. HOLMES: Yes, Your Honor.

5 THE COURT: All right, Mr. Goodman, do you  
6 have any cross-examination of Ms. Jankowicz?

7 MR. GOODMAN: Yes, Your Honor.

8 THE COURT: All right.

9 MR. GOODMAN: Okay, may I, Your Honor,  
10 show the video that contains the phone call that was the  
11 subject of all of this? It's short.

12 THE COURT: You can present your case  
13 however you would like, sir.

14 CROSS-EXAMINATION

15 BY MR. GOODMAN:

16 Q Okay, Ms. Jankowicz, I would like you to  
17 listen to this phone call.

18 Forgive me, Your Honor. I just need a  
19 moment to get to the right spot here. Somehow the sound  
20 is not coming through.

21 (Video recording played.)

22 BY MR. GOODMAN:

23 Q Now, Ms. Jankowicz, this is the first time

1 you and I had ever communicated, this phone call, is that  
2 correct?

3 A Yes.

4 MS. HOLMES: Objection, Your Honor,  
5 relevance.

6 MR. GOODMAN: She just told me that you  
7 had been experiencing --

8 THE COURT: Hold on a second. There is an  
9 objection.

10 MR. GOODMAN: Sorry.

11 THE COURT: It's overruled. She indicated  
12 in her prior testimony that this was the first contact.  
13 Go ahead, and that it was taped without her knowledge.  
14 Go ahead, Mr. Goodman.

15 BY MR. GOODMAN:

16 Q Ms. Jankowicz, did you in a phone call  
17 tell me that you had been experiencing harassment prior  
18 to this phone call?

19 A Yes, I did, and you continue that  
20 harassment.

21 Q But you had never heard of or met me prior  
22 to this phone call, correct?

23 A Mr. Goodman, I'm not testifying that you

1 are the source of all harassment. I'm just saying --

2 Q Please answer the question.

3 THE COURT: Well, okay, stop. You are not  
4 going to interrupt her answers.

5 MR. GOODMAN: I'm sorry.

6 THE COURT: If you don't think she has  
7 answered your question, you can re-ask it, but we are not  
8 going to interrupt each other. So go ahead and finish  
9 your answer, ma'am.

10 THE WITNESS: Mr. Goodman, I am not saying  
11 you are the source of all the harassment. I'm saying you  
12 are the most pernicious and persistent harasser that I  
13 have encountered.

14 BY MR. GOODMAN:

15 Q Okay, I'm going to ask you to just answer  
16 the questions, please, without editorial.

17 That was the first phone call we ever had,  
18 and you were being harassed prior to that phone call,  
19 correct?

20 A Yes.

21 Q Had you seen any news reporting or any  
22 Internet posts that I had done relative to you prior to  
23 this phone call on or around May 14th?

1           A       No.

2           Q       Thank you. I just want to point out, Ms.  
3 Jankowicz, and to the Court --

4           MS. HOLMES: Objection, Your Honor. It  
5 needs to be a question. This is cross.

6           MR. GOODMAN: There are three --

7           THE COURT: I'm going to let him ask his  
8 question, and then depending on what the question is,  
9 I'll take up your objection.

10          BY MR. GOODMAN:

11          Q       My question is this. Are you aware of  
12 David Sweigert? Do you know who that is?

13          A       Only because of the lawsuit that you named  
14 me in. Otherwise, I would have no idea who he was, and I  
15 have never communicated with him before.

16          Q       Are you aware of Tamara Wittes?

17          A       I have --

18          MS. HOLMES: Objection, Your Honor,  
19 relevance.

20          MR. GOODMAN: It's relevant.

21          THE COURT: What's the relevance, Mr.  
22 Goodman?

23          MR. GOODMAN: Tamara Wittes is the husband

1 of an individual who is in the civil lawsuit, who is  
2 represented by the same attorney as Ms. Jankowicz.

3 MS. HOLMES: Again, relevance, Your Honor,  
4 as to this protective order proceeding.

5 MR. GOODMAN: I have alleged that Ms.  
6 Jankowicz is involved in crimes, and these people, I  
7 allege, are involved with her.

8 THE COURT: But how is that relevant to  
9 these proceedings, whether or not you have engaged in  
10 behavior that is threatening to her?

11 MR. GOODMAN: Well, let me come back to  
12 that, because I am engaged in news reporting. Ms.  
13 Jankowicz says that I have --

14 MS. HOLMES: Objection, Your Honor, it  
15 needs to be question. It's not Defendant's time to put  
16 on his evidence.

17 BY MR. GOODMAN:

18 Q Okay, please define harassment.

19 A Harassment is repeatedly contacting,  
20 annoying, threatening people with extraneous contact  
21 after they've stopped -- asked you to stop contacting  
22 them, which I did.

23 Q I don't think those are all the elements

1 of harassment. Can you define fraud?

2 MS. HOLMES: Objection, Your Honor,  
3 relevance.

4 THE COURT: That is sustained, sir. What  
5 this -- what we are here on is whether or not there is  
6 evidence that you have threatened, committed an act of  
7 violence, force, or threat as defined in the Code, and  
8 that is what this hearing is going to be limited to.

9 MR. GOODMAN: Thank you, Your Honor.

10 BY MR. GOODMAN:

11 Q Ms. Jankowicz, did you file a police  
12 report with the Arlington Police on January 5th?

13 A Yes, I did.

14 Q And did you tell the police that starting  
15 in April, 2022, shortly after the announcement of the DHS  
16 Disinformation Governance Board, of which I was the  
17 Executive Director, Jason Goodman began making regular  
18 video broadcasts about me and my role, defrauding me by  
19 recording phone calls under false pretenses?

20 A I used the word defraud to say that you  
21 had made me believe you were a friend of Brandy  
22 Zadrozny's, and recorded the phone call without my  
23 consent.

1           Q        Can you tell please tell me what defraud  
2 means?

3           A        I'm not here to have my vocabulary tested.

4           Q        Okay, but when you make a statement to the  
5 police, if you use a word, and it is not true, that is a  
6 false statement to the police. What did I say that was  
7 fraudulent in the phone call?

8           A        You recorded the phone call without my  
9 consent and then released it to your followers. You said  
10 have you heard of me from Brandy. I assumed you were a  
11 friend of Brandy's. That was getting at me using social  
12 engineering at a very vulnerable time in my life.

13                  And then you called me two subsequent  
14 times after that, but you didn't play the phone call in  
15 which I asked you to stop calling me. Then you started  
16 calling me in January again, which is why I sought this  
17 protective order.

18           Q        Okay. So are you aware that New York  
19 State is a single-party consent state, and that it is  
20 lawful to record a phone call without telling --

21                  MS. HOLMES: Objection, Your Honor,  
22 relevance.

23                  THE COURT: I'll overrule the objection.

1 It's what she's aware of.

2 THE WITNESS: I wasn't aware at the time,  
3 because I'm not aware of all of the different statutes  
4 regarding, you know, recording, but I still think what  
5 you did was a very dirty and nasty thing meant to attract  
6 harassment to me and my person and my family, as is  
7 evidenced by the fact that you are appealing a protective  
8 order today.

9 BY MR. GOODMAN:

10 Q Well, that is your opinion. So it's  
11 possible, from what you're telling me, it seems like you  
12 may have said things to the police, and you were  
13 mistaken?

14 A No, I don't --

15 MS. HOLMES: Objection, Your Honor.

16 BY MR. GOODMAN:

17 Q Well, you said you don't know the law in  
18 New York.

19 THE COURT: Sustained. You can argue all  
20 of that, Mr. Goodman. You can go ahead and move on.

21 BY MR. GOODMAN:

22 Q Okay. So you said I defrauded you with  
23 false pretenses. What were the false pretenses?

1           A       I've already explained that you said have  
2 you heard of me from Brandy. I assumed you were a friend  
3 of Brandy Zadrozny's.

4           Q       So it's your assumption?

5           A       Was that not your intention?

6           Q       My intention --

7                   THE COURT: Okay, folks, this is not going  
8 to be a back and forth, okay? So you need to ask a  
9 question related to the protective order. You need to  
10 answer his question, but we're not going to just have a  
11 back and forth all day.

12                  BY MR. GOODMAN:

13                  Q       Okay, you've submitted Exhibit 9, I  
14 believe. So this Exhibit from the video that was  
15 published on February 14th, I heard you say earlier that  
16 you can read your birth date on the video.

17                  Now, you may not know this, but printers  
18 are much higher resolution than video. Why did you  
19 select the frame where the birth date is not visible?

20                  A       I did not print this out, Mr. Goodman, but  
21 if the Judge wishes to verify you can see my birth date,  
22 she is welcome to do that.

23                  Q       And you've told us you obtained this

1 before the Court hearing on February 14th. Can you tell  
2 us about that? How did you obtain this and when exactly  
3 did you obtain this?

4 A Mr. Goodman, I'm a disinformation  
5 researcher. It may surprise you to know that I know how  
6 to use the Internet. But once you started harassing me,  
7 I started keeping tabs on what you were saying about me.  
8 And so before we went to court on February 14th, I went  
9 to see if you were coming to court, and lo and behold,  
10 you had posted this video, a scheduled video, to make it  
11 seem like you weren't coming to court.

12 You had recorded it the day before, and I  
13 saw that day that you had posted the video. We grabbed  
14 the screen shot. We printed it out, and we came here.

15 Q Ms. Jankowicz, how do you know what I  
16 intend to do?

17 A Because your intentions are very clear in  
18 that you continued to harass me a year after you first  
19 made contact with me. Again, tens of thousands of people  
20 have harassed me, defamed me, and threatened me. You are  
21 the only one against whom I sought a protective order.

22 Q Have any of the other people who you  
23 allege have harassed you sued you civilly?

1 MS. HOLMES: Objection, Your Honor,  
2 relevance, and outside the scope of direct.

3 THE COURT: Sustained. I don't know what  
4 the relevance of that is. Well, why don't you answer,  
5 Mr. Goodman, what the relevance of that question is  
6 before I rule on the objection?

7 MR. GOODMAN: She has made several points  
8 that there are so many people harassing her, but I am the  
9 only one she's brought a protective order against, and I  
10 allege she did that because she knew that I was going to  
11 sue her, and that this was a strategy to prevent me from  
12 sharing evidence about that lawsuit.

13 THE COURT: Okay. Well, that is all  
14 argument, but I'll overrule the objection. You can  
15 answer whether any of the other people that you allege  
16 have threatened or harassed you have filed civil suits  
17 against you?

18 THE WITNESS: No, they have not.

19 BY MR. GOODMAN:

20 Q Have I ever threatened you?

21 A Yes. You said that I should be tried for  
22 treason and put in jail. You said that my baby should be  
23 put in a separate jail. You said that I should get an

1       abortion, and you said that -- you have repeatedly shared  
2       my personal information about my in-laws and my husband.

3                     So, yes, you have -- that is a threat to  
4       me, Mr. Goodman, your sharing of my personal information.

5                     Q           Ms. Jankowicz, do you believe that civil  
6       and criminal procedures in court are threats from me?

7                     MS. HOLMES: Objection, Your Honor,  
8       relevance, argumentative.

9                     MR. GOODMAN: You just said I was  
10      threatening you with charging you with criminal charges.

11      And I'm --

12                     THE WITNESS: That is not what I said.

13                     THE COURT: Okay, whoa, stop. I'm going  
14      to overrule the objection. She can identify what -- she  
15      has identified what she believes were threats. She can  
16      answer that question.

17                     THE WITNESS: I'll repeat what I said.  
18      You have said that I should be thrown in jail and tried  
19      for treason. You said that my baby should be thrown in a  
20      separate jail. You speculated whether my baby even  
21      exists. You have repeatedly shared my personal  
22      information to a platform that is known for violent  
23      harassment, Alex Jones' Infowars platform.

1                    You have shared my in-laws' personal  
2 information. You have sought information about my  
3 husband. Yes, that is a threat.

4                    BY MR. GOODMAN:

5                    Q                Now, you've said many times I've shared  
6 your information on Alex Jones Infowars. You are aware  
7 that YouTube and Twitter are user content generated based  
8 websites, right? The stuff put there is made by  
9 individuals like me, right?

10                  A                Yes. Yes, I am.

11                  Q                Are you aware that Alex Jones Infowars is  
12 not like that, that only employees of Infowars can put  
13 things on there. And I have no access to that. Are you  
14 aware of that?

15                  A                No. I am not aware of that.

16                  Q                Okay, well, now you're aware of that, that  
17 I have not posted to Infowars.

18                  MS. HOLMES: Objection, Your Honor, there  
19 is no question before the Court.

20                  BY MR. GOODMAN:

21                  Q                Are you aware of Benjamin Wittes?

22                  MS. HOLMES: Objection, Your Honor,  
23 relevance, and outside the scope of direct.

1                   THE COURT: What's the relevance, Mr.  
2 Goodman?

3                   MR. GOODMAN: I'll move on to another  
4 question.

5                   BY MR. GOODMAN:

6                   Q         Ms. Jankowicz, did you check off on this  
7 petition for a preliminary protective order that the  
8 Petitioner is or has been within a reasonable period of  
9 time subjected to an act of violence, force, or threat?

10                  A         Yes.

11                  Q         And isn't it true that on February 14th,  
12 in Court, you said to Judge Rucker that Jason Goodman did  
13 not threaten you?

14                  A         I believe I said I didn't believe that you  
15 posed a violent threat to me, but you do pose a threat to  
16 me, Mr. Goodman, as I have attested to today.

17                  Q         Did you tell the judge on February 14th  
18 that Jason Goodman did not threaten you, but someone who  
19 had watched Jason Goodman's news report had threatened  
20 you? Did you or did you not say that?

21                  A         I cannot recall exactly what I said, and  
22 we didn't have a court reporter, so I'm not going to  
23 answer that question.

1 Q Did you know that there wouldn't be a  
2 court reporter there that day?

3 MS. HOLMES: Objection, Your Honor,  
4 relevance and argumentative.

5 THE COURT: I'll overrule the objection.  
6 It just goes to what her knowledge was.

7 THE WITNESS: I didn't know that day  
8 whether there would be a court reporter or not.

9 BY MR. GOODMAN:

10 Q Well, you're right. There wasn't one, and  
11 --

12 THE COURT: Okay, Mr. Goodman, I am going  
13 to ask you to limit it to questions right now. You will  
14 have an opportunity to argue.

15 BY MR. GOODMAN:

16 Q Ms. Jankowicz, the evidence that you  
17 presented relative to a previous news report that I had  
18 done, where I went to CHI Memorial Hospital in  
19 Chattanooga, do you believe that Tiffany Dover lives at  
20 the hospital?

21 MS. HOLMES: Objection, Your Honor,  
22 relevance, and that's outside the scope. That calls for  
23 speculation.

1 BY MR. GOODMAN:

2 Q You said I've been to people's homes, and  
3 then you presented that evidence. Do you believe she  
4 lives at the hospital?

5 THE COURT: Okay, I'm going to overrule  
6 the objection. You put the podcast into evidence. I'll  
7 let him probe a little bit.

8 THE WITNESS: Perhaps I misspoke.  
9 Clearly, that is her place of work. I also sought a  
10 protective order against, you know, my place of  
11 employment, but I know from your previous broadcasts that  
12 you try to show up at people's homes as well.

13 BY MR. GOODMAN:

14 Q Please cite one of those people.

15 A Well, you tried to look for the guy whose  
16 website that you scrolled through, Alan Weberman. The  
17 website got removed. That had my personal information on  
18 it, as well as a bunch of anti-Semitic conspiracies. And  
19 you tried to show up at his home and found that the  
20 address didn't exist.

21 Q Do you know if it was a home or an office?

22 A It was an address that was listed on the  
23 website, and I assume it was a home.

1           Q         But we don't know, could have been an  
2 office?

3           A         The point is, Mr. Goodman, that you show  
4 up at addresses where you believe people to be so you can  
5 harass them.

6           Q         Oh, so I can harass them. Now, you're  
7 aware that Nurse Tiffany Dover was one of the very first  
8 people to receive the mRNA vaccine and passed out seconds  
9 after receiving it on national television? Are you aware  
10 of that?

11          A         I wasn't aware until the recording, but  
12 I'm not sure how that's relevant to this proceeding  
13 today.

14          Q         Well, if I'm a news reporter, and  
15 something of national interest occurs at the hospital,  
16 CHI Memorial Hospital, and I go there to do a follow-up  
17 report, is that harassment, or is that news reporting?

18           MS. HOLMES: Objection, Your Honor,  
19 argumentative.

20           THE COURT: Sustained. You can argue all  
21 of that, counsel -- Mr. Goodman. You can argue all of  
22 those points, but this witness can give factual  
23 testimony.

1 BY MR. GOODMAN:

2 Q So I'm going to ask again for you to  
3 provide me with an incident where I went to someone's  
4 home to harass them.

5 MS. HOLMES: Objection, Your Honor, asked  
6 and answered.

7 MR. GOODMAN: No, that was an office.

8 THE COURT: All right, she has indicated  
9 there was an individual. She assumed it was his home.

10 Do you have any other examples, ma'am --  
11 no, no, counsel. Do you have any other examples, ma'am?

12 THE WITNESS: Do I?

13 THE COURT: Yes.

14 THE WITNESS: I'm aware that you went to  
15 the office of the U. S. Attorney. But to me, again, this  
16 is not about whether you show up at someone's office or  
17 home. It is about you showing up, period.

18 And you have repeatedly shared my personal  
19 address. So I assume that you would show up at my home,  
20 because that actually is where I work. So --

21 BY MR. GOODMAN:

22 Q And do you know how I obtained this so-  
23 called personal information? Did I get it from your

1 home? Did I do something illegal? Do you know?

2 MS. HOLMES: Objection, Your Honor, calls  
3 for speculation.

4 MR. GOODMAN: No, I'm asking if you know.

5 THE COURT: Overruled. She can answer  
6 whether she knows.

7 THE WITNESS: I know that public records  
8 exist, but it is against the terms of service of multiple  
9 platforms to share personal information of individuals,  
10 including our home addresses. Just because home  
11 addresses exist in property records doesn't mean that it  
12 is good practice, and certainly not good journalistic  
13 practice to share those records to your thousands of  
14 followers online.

15 BY MR. GOODMAN:

16 Q And what about if somebody makes some kind  
17 of a filing, registering as a business, registering as a  
18 foreign agent under FARA laws, if someone takes  
19 information, their home address or whatever, and uses it  
20 in a public filing like that, posts it on a public  
21 website, is that personal information or public  
22 information?

23 THE COURT: Sustained. The objection is

1 sustained. We are getting far field of what this  
2 protective order is about, Mr. Goodman.

3 BY MR. GOODMAN:

4 Q The last question is going to be, Ms.  
5 Jankowicz, do you think that the terms of service of  
6 social media websites are the laws of the State of  
7 Virginia, or are they different?

8 A The terms of service are the terms of  
9 service of the social media websites, and the social  
10 media websites are the ones who carry out administering  
11 them.

12 Q Okay, so if a social media website  
13 determines that information that an individual posts onto  
14 a public database, like a government website, maybe it's  
15 possible the social media company might say, well, this  
16 is personal information, but the law might disagree.

17 MS. HOLMES: Objection, Your Honor, that  
18 was --

19 THE COURT: Okay, I don't know what the  
20 question is. So hold on, finish your question, sir.

21 BY MR. GOODMAN:

22 Q My question is did you make this report to  
23 the police because you were concerned that I was going to

1 bring civil action against you?

2 A I made the report to the police because  
3 you continued to harass me more than seven months after I  
4 resigned from government, six and a half, and I was tired  
5 of being harassed. That is why I made the report to the  
6 police.

7 I was worried about leaving my home every  
8 morning with my dog, with my child, as you continued to  
9 harass me, to defame me, to release my personal  
10 information to your followers. That is why I made the  
11 report. I was worried you would show up at an event or  
12 at my home.

13 Q And it was you who alerted the public you  
14 were pregnant and posted a photograph of your child after  
15 he was born, his head? I remember you even posted a  
16 picture. Is that correct?

17 A Yes, I did that, and because of  
18 individuals like you, who continue to threaten my child,  
19 I have not been able to share any updates about his life  
20 in a way that normal people get to do.

21 So, yes, it was pretty hard to conceal the  
22 fact that I was nine months pregnant, Mr. Goodman.

23 Q And did I have any influence on you? Did

1 I tell you to take a job with the Department of Homeland  
2 Security or go on television, or did you do that on your  
3 own accord?

4 MS. HOLMES: Objection, Your Honor.

5 THE COURT: Sustained.

6 BY MR. GOODMAN:

7 Q So this is one of your exhibits here.  
8 This is the tweet that was published on January 4th,  
9 right? It says Disinfo Diva @ Wiczipedia. That's your  
10 Twitter account, isn't it, Wiczipedia?

11 A Is that the question, is that my Twitter  
12 account?

13 Q Well, is this the tweet that was posted on  
14 -- you know, you've entered into evidence, you set it in,  
15 so this Tweet here, it says Disinfo Diva @ Wiczipedia.  
16 So which of these links contain your private information?

17 A I don't know, Jason, because I never made  
18 the report that you allege that I made.

19 Q But you don't know who made this report?

20 A I do not.

21 Q So who can make reports to Twitter on  
22 behalf of your Twitter account other than you?

23 A Anyone can make a report on Twitter,

1 Jason. I don't know if you know how Twitter works, but  
2 you can click the three dots in the upper right-hand  
3 corner and report somebody for sharing someone's personal  
4 information, for sharing violence, for anything. Anyone  
5 can make a report like that.

6 Q But you --

7 A And at the time, I will also note that  
8 Elon Musk was really cracking down on doxxing. So you  
9 can talk to your buddy, Elon, about that.

10 Q I've never met Mr. Musk, but you've just  
11 told us that you monitor my social media activity, didn't  
12 you?

13 A Yeah, but I don't know what time --

14 Q Not this one?

15 A -- it posted.

16 Q Oh, you --

17 MS. HOLMES: Objection, asked answered,  
18 Your Honor.

19 THE COURT: Okay, I think we've --

20 MR. GOODMAN: Yeah, I think I'm done.

21 Thank you, Your Honor.

22 MS. HOLMES: No redirect, Your Honor.

23 THE COURT: May the witness step down?

1 Thank you, ma'am.

2 (Witness steps down.)

3 THE COURT: Do you have any other  
4 evidence, Counsel?

5 MS. HOLMES: No, Your Honor.

6 THE COURT: All right.

7 MS. HOLMES: We do reserve a request for  
8 attorney's fees.

9 THE COURT: What is the basis for an  
10 attorney's fees request?

11 MS. HOLMES: Your Honor, the Petitioner  
12 maintains that this is a frivolous appeal for a valid  
13 protective order, and as she's had to spend fees in order  
14 to prepare and properly defend that the protective order  
15 should stay in place, she requests that the attorney's  
16 fees are awarded.

17 THE COURT: Is there any statutory basis  
18 for attorney's fees?

19 MS. HOLMES: I don't have it right now,  
20 Your Honor, but I can hand that up to the Court.

21 THE COURT: All right, well, we can take  
22 that up at the end.

23 Mr. Goodman, do you have evidence that you

1 want to present to the Court?

2 MR. GOODMAN: Yes, Your Honor.

3 THE COURT: All right. Are you going to  
4 testify?

5 MR. GOODMAN: Yeah.

6 THE COURT: All right, I'll just need you  
7 to stand and raise your right hand, and the Clerk will  
8 swear you.

9 (The Defendant was duly sworn by the Clerk  
10 of the Court.)

11 THE COURT: All right, do you want to  
12 testify from there, so you can use your --

13 MR. GOODMAN: Yes, Your Honor.

14 Whereupon

15 JASON GOODMAN

16 the Respondent, having been duly sworn by the Clerk of  
17 the Court, testified on his own behalf as follows:

18 MR. GOODMAN: So the first thing, Your  
19 Honor, that I would like to clear up, there are three  
20 relevant videos in this matter. The first video is on  
21 the screen right now, and this is a video that I live  
22 streamed to my YouTube channel, Crowdsource the Truth  
23 Five, on May 16, 2022. And I don't know if you can see,

1 but this comes from my broadcasting system --

2 THE COURT: I don't have it on here. Is  
3 it on --

4 MR. GOODMAN: It's on this.

5 THE COURT: Is there a way you can -- hang  
6 on a second. Got it, all right, very good.

7 MR. GOODMAN: So we can see this video is  
8 titled 2022-5-16. That indicates that it was recorded on  
9 May 16th, and then you see 20:00. That is a 24-hour  
10 clock. The video began at 8 PM Eastern time.

11 And this video is -- forgive me, I've lost  
12 the mouse -- this video is one hour and 27 minutes in  
13 duration, and you can see that because it was finalized  
14 at 9:27 PM.

15 Now, this video was live streamed after I  
16 conducted quite a bit of investigation into Ms.  
17 Jankowicz. I'm very concerned about the time Ms.  
18 Jankowicz spent as a Clinton Fulbright Scholar in Ukraine  
19 in February and March of 2014.

20 MS. HOLMES: Your Honor --

21 MR. GOODMAN: She's a public figure --

22 THE COURT: Hang on a second. What is  
23 your objection, Counsel?

1 MS. HOLMES: This is not relevant to the  
2 proceeding today.

3 MR. GOODMAN: I'm explaining my research.

4 MS. HOLMES: Again, not relevant to the  
5 proceeding, Your Honor.

6 MR. GOODMAN: It's relevant to this video.

7 MS. HOLMES: It's about the protective  
8 order sought by Ms. Jankowicz, not about Mr. Goodman's  
9 conspiracy theories.

10 MR. GOODMAN: It's relevant to the video.

11 THE COURT: Okay, everyone needs to speak  
12 one at a time, okay? So she can finish her objection,  
13 and then you can respond, but we are not going to keep  
14 interrupting.

15 Why is his -- this is all about what you  
16 have asserted is threatening behavior. Why is his intent  
17 not relevant to whether or not the Court can ascertain  
18 that that behavior is threatening as set forth in the  
19 Code?

20 MS. HOLMES: Yes, Your Honor. The  
21 research and background and baseless information that he  
22 compiled against Ms. Jankowicz is not relevant. What is  
23 relevant is the persistent fact of him posting repeated

1 information, including her personal information.

2 THE COURT: The objection is overruled.

3 Go ahead.

4 MR. GOODMAN: I was very concerned about  
5 Ms. Jankowicz's time in Ukraine in February and March of  
6 2014, and I began looking into her and her relationship  
7 with Tamara Wittes, who is currently, I believe, the  
8 Deputy -- well, let's put a pin in that for now.

9 The point is this video was broadcast May  
10 16th, and it is an hour and 27 minutes in length, and at  
11 approximately 55 minutes, I start looking into this  
12 archived website. Now, I'm utilizing a public website  
13 called Archive.org. I have no access to Ms. Jankowicz's  
14 personal information.

15 I only deal in public domain information.  
16 And I was looking at this website that I had found in the  
17 due course of conducting normal investigation on the  
18 public Internet.

19 I've never tempted to breach Ms.  
20 Jankowicz's computer or do anything illegal. This is  
21 just information I found on the Internet.

22 Now, immediately after posting this video  
23 to Crowdsource the Truth Five, Crowdsource the Truth Five

1 was completely eliminated from YouTube. And  
2 additionally, I earn money through a credit card  
3 processing website called Patreon.

4 MS. HOLMES: Objection, Your Honor,  
5 relevance.

6 MR. GOODMAN: I'm explaining myself. I  
7 received a --

8 THE COURT: So what is the relevance of --

9 MR. GOODMAN: The relevance is I also  
10 received a message from Patreon concurrent with the  
11 removal of the video from YouTube. And Patreon said to  
12 me, hey, we've been alerted that there's personal  
13 information in this video.

14 So what I did, Your Honor, is I created a  
15 new version of the video, because I disagreed with the  
16 assessment that I had published personal information, but  
17 I didn't want to lose my ability to process credit cards,  
18 so I created this version of the video, which you can see  
19 is one hour and 23 minutes in length, and I've removed --  
20 if we go to the 55 minute mark, I've removed the segment  
21 that contained the information that Ms. Jankowicz  
22 objected to.

23 Additionally, I went to the trouble of

1 tiling out the address on this public filing with the  
2 Virginia Secretary of State, a public website. So as a  
3 courtesy to Ms. Jankowicz, and to protect her personal  
4 information, when I was made aware that she objected to  
5 it being shown, I eliminated it.

6 This is the only version of the video that  
7 is published on any websites that I control. Now, the  
8 third version of video is this. This video came from an  
9 Alex Jones website called Banned.Video. I have an image  
10 of that website here.

11 Okay, so, we're not on the Internet right  
12 now, but this is a screen capture of the Alex Jones  
13 website from earlier this morning. You can see that it  
14 was posted there May 18th, and I have no ability to post  
15 things on this website.

16 I do not work for Alex Jones. I don't  
17 have Alex Jones' phone number. I have spoken to him. I  
18 have appeared on his show. I've also been on Tucker  
19 Carlson. I've been on a lot of national news shows.  
20 Some people think I'm a very good reporter.

21 Anyway, this video from Alex Jones, I  
22 presume they downloaded from my YouTube channel the day  
23 it was published, because it got a lot of attention.

1 Now, you can see that this video is an hour and 29  
2 minutes in length, because after they downloaded my video  
3 -- and by the way, this video, Alex Jones got it right  
4 from YouTube before I had removed the segment at the 55  
5 minute mark.

6 And so that still contains the  
7 objectionable material that Ms. Jankowicz doesn't like.  
8 But what the people at Infowars did, they took my video,  
9 and then they added their advertising at the end. I had  
10 nothing to do with this. I don't control Alex Jones, and  
11 he does whatever he wants.

12 So with regards to Ms. Jankowicz's  
13 assessment that these videos have been removed from other  
14 channels, there is an individual who is involved in the  
15 civil action that I brought against Ms. Jankowicz by the  
16 name of David George Sweigert --

17 MS. HOLMES: Objection, Your Honor,  
18 relevance.

19 MR. GOODMAN: -- who is relevant to this  
20 matter, because I believe he has been making complaints  
21 on behalf of Ms. Jankowicz. And --

22 THE COURT: Okay, well, again, I need you  
23 to testify to facts and not things that may be proven in

1 something else or based on beliefs. So --

2 MR. GOODMAN: Let me share my intention --

3 THE COURT: -- I need you to focus on the  
4 subject of this, which is whether or not you engaged in  
5 conduct that was threatening as that is defined in the  
6 Virginia Code for purposes of the protective order.

7 MR. GOODMAN: Okay. So this video that  
8 the image was presented on February 14th, of me showing  
9 the protective order --

10 THE COURT: We're now discussing Exhibit  
11 3?

12 MR. GOODMAN: Exhibit 3. Just to clarify  
13 by intent in publishing this, it was to distract David  
14 George Sweigert, because he stalks and harasses me daily.  
15 And I allege he was involved in getting this material to  
16 Ms. Jankowicz, because it arrived in court virtually  
17 concurrent with its broadcast.

18 She is correct. I timed it to play while  
19 we were in court. This evidence was not in here hand  
20 when she walked in the door.

21 MS. HOLMES: Objection, Your Honor.

22 That's speculation.

23 MR. GOODMAN: Well, I know when I

1 programmed it to go, and I know what time the hearing  
2 began. And I know what my intent was.

3 THE COURT: Well, he is testifying based  
4 on what he believes the facts to be, and ultimately, I'll  
5 have to make a factual determination. Overruled.

6 MR. GOODMAN: So that was my intent, was  
7 to ferret out exactly what David George Sweigert has to  
8 do with this, and I did not know that Ms. Jankowicz's  
9 birth date was on this document.

10 I've reviewed the video subsequent to that  
11 February 14th hearing, and I could not make out the birth  
12 date. If there's a fame in there that shows it, I'd like  
13 to see it.

14 Also, Ms. Jankowicz has testified earlier  
15 today that I have stated that I intend to harass her.  
16 That is not true. My statement was that I intend to  
17 bring her to justice, because I have seen a lot of  
18 evidence that causes me to believe she is involved in a  
19 very serious array of crimes, and that her activities in  
20 Ukraine in 2014 are related.

21 That is the nature of my research. I am a  
22 serious journalist and documentary filmmaker, and all of  
23 the evidence that I have presented is factual. I have

1 never threatened Ms. Jankowicz. I have no control over  
2 what the people who watch my news broadcasts do.

3 And the other thing that I wanted to bring  
4 to your attention, Your Honor, so the police report was  
5 made on January 5th, and it contains a number of false  
6 statements. What happened subsequent to this police  
7 report is I submitted to -- forgive me, I should have  
8 brought this as an exhibit.

9 In the civil case Ms. Jankowicz is now  
10 named in, as discussed in some of these emails that she  
11 has provided as evidence, I had to alert the Court that I  
12 needed an extension of time because my mother was having  
13 spinal surgery, and I was going to be out of town for  
14 several days or weeks. That was on January 9th, the same  
15 day that Ms. Jankowicz filed this petition in which she  
16 falsely told the Court that it was me, the Respondent,  
17 who had within a reasonable period of time subjected her  
18 to an act of violence, force, or threat.

19 MS. HOLMES: Objection, Your Honor,  
20 relevance.

21 MR. GOODMAN: The relevance is she made  
22 this false --

23 THE COURT: Okay, I'm going to overrule

1 the objection, but I'm going to ask you again, Mr.  
2 Goodman, to just testify as to facts.

3 So what I ultimately have to do -- you can  
4 argue whatever you all want, but this is your testimony,  
5 and so you need to limit it to that. So go ahead, sir.

6 MR. GOODMAN: Very good, Your Honor. On  
7 January 9th, I filed a document with the US District  
8 Court for the Southern District of New York, alerting the  
9 Judge and David George Sweigert, and other litigants in  
10 the case, that at that time did not yet include Ms.  
11 Jankowicz, but she was aware of the litigation, because I  
12 had sent her several emails letting her know that she  
13 would be added to the litigation if she did not withdraw  
14 the complaint from Twitter.

15 She did not tell me at that time by email  
16 or through her attorney that she hadn't made the  
17 complaint to Twitter. She did not threaten me with a  
18 cease and desist or a defamation lawsuit. She simply  
19 went to this building and -- or somehow filed this  
20 preliminary protective order in which she alleged that I  
21 had subjected her to an act of violence, force, or  
22 threat.

23 She didn't tell them that I defrauded her.

1       She could have had her lawyer send me a letter to remove  
2       whatever statements she felt were defamatory or libelous  
3       or any of the other inaccurate terms that she has applied  
4       to my news reporting.

5                     But the time proximity of the filing of  
6       this preliminary protective order directly matched the  
7       time that I had alerted the US District Court in the  
8       Southern District of New York that I would be caring for  
9       my mother during and after her spinal surgery, something  
10      that this individual, David George Sweigert, did a lot of  
11      activity around. I allege this is related.

12                  What the net result was, there was a  
13       summons taped to my door that I didn't know about until,  
14       I believe it was February 12th when I returned home, and  
15       I had to quite quickly reverse myself and drive right  
16       back down south here to Virginia to attend this hearing,  
17       where Ms. Jankowicz received this protective order.

18                  I believe that's all I have to say right  
19       now.

20                  THE COURT: All right, cross-examination,  
21       Counsel?

22                  MS. HOLMES: Yes, Your Honor.

23                  CROSS-EXAMINATION

1 BY MS. HOLMES:

2 Q In the Disinfo Diva video that you shared,  
3 removing the personal information, when did you edit  
4 that?

5 A I believe it was May 18th. I've got it  
6 right here, so I'll check.

7 Q So the hearing on the 14th, the video was  
8 still posted containing the personal information?

9 A False.

10 Q And then there is an original video  
11 containing the personal information still available as  
12 recently as July 1, 2022?

13 A Say that again.

14 Q There is a video, the original video that  
15 you made containing the personal information, is still  
16 available, and it was available as recently as July 1,  
17 2022?

18 A No website that I control is hosting the  
19 video with the objectionable material. Immediately upon  
20 being notified that it was objectionable to Ms.  
21 Jankowicz, and that notification came in the form of  
22 removal from YouTube and the removal from Patreon, to  
23 restore the Patreon account, I made the edit.

1                   That was the 17th or 18th of May. It was  
2 back up. No channel that I control had the objectionable  
3 video after May 18, 2022.

4                   Q           So the clip that you shared on Twitter on  
5 January 4th, 2023, that was a violation, that contained  
6 the personal information?

7                   A           It was not a violation, and it did not  
8 contain personal information.

9                   MS. HOLMES: Your Honor, I'd like to  
10 direct you to Petitioner's Exhibit Number 8, with the  
11 video that was posted, Disinfo Diva, Dangerous Double  
12 Agent, Who is Nina Jankowicz. That is the video that was  
13 posted, shared the link on the Twitter video containing  
14 the personal information.

15                  MR. GOODMAN: No, object. I object, Your  
16 Honor.

17                  THE COURT: Well, you disagree that that's  
18 what that Exhibit 8 is, is that correct? Because it's  
19 already in evidence. So is your testimony in response to  
20 her question that you do not agree that that's what that  
21 Exhibit 8 is?

22                  MR. GOODMAN: I do not agree that Exhibit  
23 8 contains the original video with the objectionable

1 material. It links to the edited video and whoever made  
2 that complaint neglected to verify the content of the  
3 video.

4 I hope it's becoming clear that it is  
5 confusing. It's got the same name, but it's four minutes  
6 shorter, and the objectionable material has been removed.  
7 I think what happened was it just appeared, and it looked  
8 like the same video, and Ms. Jankowicz, or whoever made  
9 this complaint, assumed it was the same video.

10 This is why I sent the email saying you've  
11 made a false statement. Withdraw the false statement,  
12 restore the Twitter account, and I'll leave you alone.  
13 There was no response to that litigation warning email  
14 whatsoever. That resulted in me bringing the lawsuit.  
15 It was not a frivolous lawsuit. It is not a fraudulent  
16 lawsuit. It --

17 MS. HOLMES: Your Honor, there is no  
18 question before the Respondent.

19 MR. GOODMAN: -- could have been  
20 completely avoided if I had just been responded to.

21 THE COURT: All right. So that is his  
22 response to your claim that Exhibit 8, which contains the  
23 personal information, was still up as of July of 2022.

1 Go ahead and ask your next question, Counsel.

2 MS. HOLMES: And it was also still up as  
3 far as January 4, 2023.

4 BY MS. HOLMES:

5 Q Did you send an email to David George  
6 Sweigert cc'ing a variety of people, including Ms.  
7 Jankowicz, on May 10, 2023, stating I will see David  
8 George Sweigert and any of his co-conspirators sent to  
9 prison if it takes the rest of my life to accomplish  
10 that?

11 A It sounds like an email that I would have  
12 sent to David George Sweigert, because he's been  
13 persistently harassing me for the past six years doing  
14 all these types of things. Yeah, I sent that email.

15 MS. HOLMES: Your Honor, I'd like to mark  
16 this as Petitioner's Exhibit 10.

17 THE COURT: All right, you already have a  
18 10, so this would be 11.

19 (The above-referenced  
20 document was marked  
21 Petitioner's Exhibit No.  
22 11 for identification.)

23 BY MS. HOLMES:

1 Q It's already in your testimony that you've  
2 included Ms. Jankowicz in the lawsuit because you  
3 consider her a co-conspirator of Mr. Sweigert?

4 A I included her in that lawsuit because she  
5 refused to withdraw the complaint to Twitter. As I have  
6 warned her in the litigation, she could have avoided all  
7 this by saying I didn't make the complaint.

8 Q Isn't it true that you believe Ms.  
9 Jankowicz is a foreign agent?

10 A Yes, because the evidence that I found  
11 caused me to believe that. She resigned from her  
12 position two days after I publicly published it, and then  
13 six months later, she registered under FARA. Now, she is  
14 a registered foreign agent, isn't she?

15 Q Isn't it true that you believe that she  
16 should be in jail?

17 A I believe she should receive due process  
18 and have a trial, and I'd like to testify at that trial.  
19 And I think the evidence I have will put her in jail,  
20 yes.

21 Q Isn't it true that you believe Ms.  
22 Jankowicz should be shunned from society?

23 A Yes.

1           Q       Isn't it true that you stated that you  
2 don't think criminals should procreate?

3           A       Well, that's my opinion.

4           Q       Isn't it true that you have stated doesn't  
5 the baby need attention, why doesn't she get an abortion,  
6 they seem to want everybody else to do that, get abortion  
7 an abortion to do this job?

8           A       Those comments were made in the context of  
9 --

10          Q       Please answer the question.

11          A       I am answering the question. Those  
12 comments were made in the context of an environment where  
13 there was a large heavily politically left movement in  
14 the country advocating for abortion, and my  
15 extemporaneous question that I was sort of asking my  
16 audience in the course of the live stream was, if  
17 politically left wing individuals are so enthusiastic  
18 about abortion, and if Ms. Jankowicz is politically left  
19 and wanting to have this very important demanding job,  
20 why not just do what the left encourages and get an  
21 abortion.

22                   I wasn't threatening to give her an  
23 abortion. I was simply asking a rhetorical question that

1 was meant to be critical of what I see as a hypocritical  
2 political point of view.

3 Q Isn't it true that you called Ms.  
4 Jankowicz's child demon spawn?

5 A That was an insult, a statement of  
6 opinion.

7 Q And that's a statement that you made?

8 A It may be. I would have to review the  
9 video.

10 Q Isn't it true that you have contacted Ms.  
11 Jankowicz over 60 times in the past year?

12 A I don't believe that's true. Contacted  
13 her 60 times? I don't think that's true. I phoned her a  
14 few times. I phoned her once to invite her to an  
15 interview, which we heard earlier, she declined.

16 Two days later, she was fired or resigned.  
17 Something happened. She was no longer in that position.  
18 So then I called her again to ask her now that she was no  
19 longer working there if she could give me an interview.  
20 And then she told me not to contact her again, which I  
21 honored, until I perceived that she had done something to  
22 me, which was to make this fraudulent complaint against  
23 my Twitter account.

1                   And in that case, my contact to her was  
2 not harassment, because it didn't exist without a  
3 purpose. The purpose in contacting her was to let her  
4 know that in my perception, she had made a fraudulent  
5 statement, and if she didn't remove it, she would be  
6 sued.

7                   MS. HOLMES: Your Honor, can you please  
8 instruct the Respondent to answer the question?

9                   THE COURT: No, you've asked a question.  
10 He can answer it. You can obviously make your questions  
11 more directed, but at this point, I'm going to let him  
12 answer the question, just as I let your client answer the  
13 questions.

14                   MS. HOLMES: Okay.

15                   BY MS. HOLMES:

16                   Q         Isn't it true that you recorded at least  
17 12 videos discussing Ms. Jankowicz?

18                   A         I'd have to review the videos. I don't  
19 know the actual number, but she was a public figure who  
20 had announced her intention to violate the First  
21 Amendment of the U.S. Constitution, and I found this  
22 reprehensible and criminal. So I think I could have made  
23 a hundred videos about that, and you really wouldn't be

1 able to say anything about it.

2 Q Isn't it true that you've repeatedly  
3 released and reposted videos containing Ms. Jankowicz's  
4 personal information?

5 A Can you say that again, please?

6 Q Isn't it true that you've repeatedly  
7 released and reposted videos containing Ms. Jankowicz's  
8 personal information?

9 A I'm not sure if that is true. Repeatedly  
10 released and reposted, I don't think that's true.

11 Q Isn't it true that you reposted the video  
12 on February 14th containing Ms. Jankowicz's personal  
13 information in the temporary protective order?

14 A Posted it in a temporary -- could you  
15 clarify that, please?

16 Q Isn't it true that you released Ms.  
17 Jankowicz's personal information contained within her  
18 protective order on February 14th, 2023?

19 A I don't understand the question. On  
20 containing in a protective order? What?

21 Q Isn't it true that you released Ms.  
22 Jankowicz's personal information that was within the  
23 temporary protective order in a video posted on February

1 14th, 2021?

2 A Okay, you're talking about the birth date.  
3 I don't believe that's true. First of all, I didn't  
4 realize -- I did not realize that birth date was on the  
5 document at the time that I recorded the video.

6 After it came out at the hearing on  
7 February 14th, I went back and reviewed the video, and  
8 I'm not able to see the birth date there, and I have the  
9 original recording. We see the evidence that you've  
10 presented. It's totally not legible. I don't understand  
11 why you would submit an evidentiary document --

12 THE COURT: Okay, Mr. Goodman, I am going  
13 to ask you to stop arguing with everybody, okay? You  
14 will have argument at the end of the case, but you need  
15 to answer the questions.

16 THE WITNESS: I disagree. I do not  
17 believe that her personal information was posted in this  
18 video, and the video has not been removed from YouTube,  
19 because I don't think there's evidence that I posted her  
20 personal information.

21 The video is still there, as far as I  
22 recall. I do not believe that has been removed, and the  
23 channel wasn't disrupted. So that video is still there.

1 MS. HOLMES: Your Honor, Court's  
2 indulgence.

3 BY MS. HOLMES:

4 Q Have you ever shared the link to the  
5 Infowars posting of the Disinfo Diva video?

6 A Ever? I don't recall. I don't know.  
7 Probably -- I mean, I'm mostly trying to drive traffic to  
8 my sites, so I don't know if I have. I don't think I  
9 would. Maybe I have. I don't know. Do you have any  
10 evidence of me doing that?

11 MS. HOLMES: Thank you, Your Honor. That  
12 concludes the cross.

13 THE COURT: All right. Do you have any  
14 rebuttal or redirect that you want to do of yourself, Mr.  
15 Goodman, after your cross-examination? Is there anything  
16 else that you want to present at this time?

17 MR. GOODMAN: I think that's -- no, Your  
18 Honor. I think --

19 THE COURT: All right, any rebuttal  
20 evidence, Counsel?

21 MS. HOLMES: No, Your Honor.

22 THE COURT: All right. So then both  
23 parties rest? All right, I'm going to go ahead and take

1 just a five-minute restroom break, and then I'll come  
2 back and hear both parties' closing arguments, all right?

3 MR. GOODMAN: I'm sorry, I have one  
4 witness. I'm sorry.

5 THE COURT: Oh, you have a witness that  
6 you want to call?

7 MR. GOODMAN: Yes.

8 THE COURT: All right.

9 MR. GOODMAN: Detective John Adams with  
10 the Arlington Police.

11 DETECTIVE ADAMS: Good morning, Your  
12 Honor.

13 THE COURT: Good morning. Would you  
14 please swear that Detective?

15 (The Witness was duly sworn by the Clerk  
16 of the Court.)

17 Whereupon

18 DETECTIVE JOHN ADAMS  
19 a Witness, was called for examination by the Respondent,  
20 and having been duly sworn by the Court, was examined and  
21 testified as follows:

22 DIRECT EXAMINATION

23 BY MR. GOODMAN:

1 Q Good morning, Detective.

2 A Good morning, sir.

3 Q You are familiar with a police report  
4 filed by Ms. Jankowicz on January 5th, correct?

5 A Yes, sir, I am.

6 Q So at the bottom of this police report,  
7 there is a parenthetical note, I guess, that references  
8 Detective Adams, number 1315. That's you, correct?

9 A Yes, that is my badge number. Yes, sir.

10 Q And the note says I spoke with the  
11 reporting party, and they advised me that the individual  
12 did not specifically make a death threat towards them.  
13 It was supposedly one of his online followers. The  
14 reporting party was just -- the incident -- just wants  
15 the incident documented for right now.

16 A Yes, sir, that's true.

17 Q And that's your note that you wrote?

18 A Yes, correct, sir.

19 Q Can you tell me a little bit about how a  
20 report like this gets created?

21 A Yes, sir, I can. So I'm a detective in  
22 the systems management division of the Arlington County  
23 Police Department in which I oversee all the online

1 reporting system in which a citizen can file a police  
2 report through the online portal.

3 My particular job, as a detective, I  
4 review all the online reports that come through. I  
5 perform follow-up, which means I'll contact the reporting  
6 party or the victim, or sometimes even the suspect or a  
7 witness. I'll either approve a report or reject the  
8 report. And in most cases for harassments, I actually  
9 investigate the harassments in the reports that come  
10 through online.

11 Q So was this considered a harassment  
12 report?

13 A Well, the way Ms. Jankowicz filed it as a  
14 harassment report, it came through as a harassment  
15 report, yes, sir.

16 Q And did you follow up with an  
17 investigation?

18 A I did not. And the reason for that, sir,  
19 is because when I spoke to Ms. Jankowicz on the phone,  
20 she just wanted the incident documented.

21 When the victim of a reporting party tells  
22 me that, I don't do any investigation whatsoever.

23 Q And so it's normal for you to follow up

1 and have a note like this at the bottom of a report?

2 A Yes, and I can elaborate as to why I  
3 specifically asked her --

4 Q Please.

5 A Okay. So when those harassments come in  
6 like that, the reason why I specifically ask the  
7 reporting party or the victim if there was any type of  
8 physical or death threats made towards them is because  
9 that's actually a separate charge, and it's placed in  
10 writing in the State of Virginia.

11 It's a felonious charge. It's a -- if  
12 that were the case, then that type of incident cannot be  
13 filed online, so therefore, I would actually have to  
14 write out the report.

15 So I specifically have to ask the  
16 reporting party or victim that particular question, so  
17 that's why I asked Ms. Jankowicz that.

18 Q And so there's been no further  
19 investigation, and did you make any kind of determination  
20 if the claims that Ms. Jankowicz was making satisfied the  
21 elements of the crime of harassment in Virginia?

22 MS. HOLMES: Objection, Your Honor, asked  
23 and answered. The witness already said he did not do any

1 investigation.

2 MR. GOODMAN: But that doesn't speak to  
3 whether or not the elements of the crime were met.

4 THE COURT: Okay, well, that would call  
5 for a legal conclusion. And so that objection will be  
6 sustained.

7 MR. GOODMAN: No further questions, Your  
8 Honor. Thank you.

9 THE COURT: Any cross-examination,  
10 Counsel?

11 MS. HOLMES: Yes, Your Honor.

12 CROSS-EXAMINATION

13 BY MS. HOLMES:

14 Q In your conversation with Ms. Jankowicz,  
15 what did she tell you?

16 A I can only recollect certain things,  
17 because it was so long ago. That was January.  
18 Basically, what I asked her, she pretty much reiterated  
19 what she had written in the report there. And then I  
20 asked some follow-up questions, as Mr. Goodman had  
21 already -- at the bottom, what I wrote as far as what she  
22 wanted to be done, and if any death threats were made  
23 towards her by Mr. Goodman.

1 Q And what did you advise her regarding the  
2 nature of the posts and nature of the harassment with the  
3 tweets?

4 A Advised her as far as --

5 Q As far as being able to continue or  
6 proceed with this police report?

7 A I'll be honest, I do not remember. I do  
8 not remember if I gave her advice about a protective  
9 order. Usually, I do that to reporting parties that want  
10 to file harassment charges that do not want to do  
11 anything as far as criminal. So I explain to them the  
12 process of attempting to acquire a preliminary protective  
13 order.

14 I cannot remember if I provided that  
15 advice to Ms. Jankowicz or not.

16 Q Okay, thank you. That's all the questions  
17 I have.

18 THE COURT: Any redirect, Mr. Goodman?

19 MR. GOODMAN: No, Your Honor.

20 THE COURT: All right, may this officer be  
21 excused?

22 MR. GOODMAN: Thank you.

23 THE COURT: All right, thank you very

1 much. You're excused.

2 (Witness steps down.)

3 THE COURT: All right, so my question was  
4 unclear earlier. Mr. Goodman, do you have any other  
5 evidence of any kind that you want to present at this  
6 time?

7 MR. GOODMAN: That's all, your Honor.

8 Thank you.

9 THE COURT: All right, based on that  
10 additional evidence, Counsel, do you have any rebuttal  
11 that you want to present?

12 MS. HOLMES: No, Your Honor.

13 THE COURT: All right. Then at this  
14 point, I'll go ahead and take a 10-minute break, let  
15 everyone go to the restroom, and then I'll come back and  
16 hear closing arguments.

17 (Brief Recess.)

18 THE COURT: All right, go ahead, Counsel.  
19 I'll hear your closing argument.

20 MS. HOLMES: Thank you, Your Honor. She  
21 needs to be shunned from society, never hired for  
22 anything. I'm sad to know that she is reproducing more  
23 assholes in the world. We've got to make sure she's not

1 allowed to hold any office in government, any position of  
2 importance, and she should be accountable for these IC  
3 crimes.

4                   Under Virginia Code section 19.22-152.7.1,  
5 an act of violence, force, or threat means any act  
6 involving violence, force, or threat that results in  
7 bodily injury or places one in reasonable apprehension of  
8 death, sexual assault, or bodily injury. And such act  
9 includes but is not limited to stalking.

10                  Mr. Goodman has repeatedly called,  
11 emailed, and released Ms. Jankowicz's personal  
12 information, placing her in fear of threat, and he has  
13 repeatedly harassed her through phone calls, emails,  
14 social media posts, which would constitute stalking.

15                  Mr. Goodman claims to be a journalist, but  
16 his actions are far past the investigation, and they  
17 demonstrate a fixation on Ms. Goodman -- on Ms.  
18 Jankowicz.

19                  You have heard the evidence today that Mr.  
20 Goodman has repeatedly emailed and called Ms. Jankowicz  
21 and has harassed her due to her position in government.  
22 When she stepped down on May 18th of 2022, his posts have  
23 continued up until January 4, when he emailed her, called

1 her repeatedly up to six times in the two days following  
2 his posts being taken down by Twitter, asking her to have  
3 it removed.

4                 This is no longer -- Ms. Jankowicz is no  
5 longer serving in a public office or in a governmental  
6 capacity, and Mr. Goodman's harassment has continued.  
7 Prior to the protective order being issued on February  
8 14, Mr. Goodman continued to email and call Ms.  
9 Jankowicz. He continued to file -- he filed litigation.

10                He emailed her as well through that, and  
11 he has been communicating with her, harassing her  
12 regarding the post, regarding her personal information  
13 being released, up until, and including, the day of the  
14 protective order hearing, when he released her personal  
15 information through the temporary protective order an  
16 hour before the hearing started.

17                He released it at 1 PM, and the hearing  
18 started at 2 PM that day. Mr. Goodman has said I will  
19 see David George Sweigert and any of this co-conspirators  
20 sent to prison if it takes the rest of my life to  
21 accomplish that. Mr. Goodman, apart from any court or  
22 police intervention will not stop contacting, will not  
23 stop harassing, will not stop investigating Ms. Jankowicz

1 for things that he has created in his mind that he thinks  
2 that she has violated.

3 Ms. Jankowicz requests the protective  
4 order is upheld due to this harassment, due to this  
5 stalking, and this has caused a threat of violence  
6 towards her as her information has been released. Her  
7 birth date has repeatedly been released. The videos are  
8 still posted online --

9 THE COURT: Well, hang on. Talk me  
10 through the repeatedly released. So my understanding of  
11 -- and I guess if you could go to your Exhibit 9 and walk  
12 me through. These are the excerpts from the video.

13 So when is the first time that you say  
14 that her personal information was released? Was it in  
15 the May 18, 2022, video, or was it in something before  
16 that?

17 MS. HOLMES: Her personal information was  
18 released in the Disinfo Diva -- where is that -- her  
19 personal information was released in the Exhibit 8,  
20 Disinfo Diva or Dangerous Double Agent, Who is Nina  
21 Jankowicz.

22 THE COURT: All right, so that was the May  
23 18, 2022, video, is that correct?

1 MS. HOLMES: Yes, that was the original  
2 post that Mr. Goodman posted.

3 THE COURT: All right.

4 MS. HOLMES: He then shared that widely,  
5 and it was picked up by other websites that are  
6 considered widely conspiracy theory websites.

7 THE COURT: Okay, well, the evidence I  
8 heard is it was picked up on the Alex Jones website. Was  
9 there any other evidence presented of other websites that  
10 that was picked up on?

11 MS. HOLMES: Yes, on the Banned Video  
12 website. It's Banned-Video.com.

13 MR. GOODMAN: Objection, Your Honor.

14 THE COURT: All right, well, you can argue  
15 the evidence didn't say that, but this is part --

16 MR. GOODMAN: But that's the same website.

17 THE COURT: Well, as I say, it's argument.  
18 You can make whatever argument you want. This is her  
19 argument.

20 All right, go ahead, ma'am.

21 MS. HOLMES: And that's where it's  
22 currently still available. It was repeatedly available  
23 and shared on YouTube and other sites that have all been

1 taken down because of the personal information that it  
2 contained.

3                   Then Mr. Goodman also posted her date of  
4 birth through the temporary protective order that was  
5 released on YouTube on February 14th, the day of the  
6 protective order hearing.

7                   He has also conducted numerous  
8 investigations into Ms. Jankowicz's husband. He has not  
9 been able to find any information, because that was all  
10 taken down due to his harassment and repeated  
11 investigation into Ms. Jankowicz.

12                  He has also looked for personal  
13 information regarding her child that she has not posted  
14 online due to his harassment and continuing, what he  
15 considers investigation.

16                  THE COURT: So what evidence was presented  
17 with respect to what actions he took regarding her child  
18 and when he did that? I'd like to hear what you believe  
19 the evidence is on that.

20                  MS. HOLMES: Yes, those would be the video  
21 exhibits, Exhibit Number 6, Exhibit Number 7. In Exhibit  
22 Number 6, he states this alleged husband of hers has --  
23 is a virtual Internet ghost. Surrounding that quote, he

1 was discussing how he could not find any information  
2 about her husband, because he repeatedly had been  
3 looking.

4                   He also -- and then regarding the child,  
5 he just has repeatedly, in video Exhibit Number 5, video  
6 Exhibit Number 6, video Exhibit Number 7, discussed her  
7 child in very derogatory and specific ways, and also  
8 suggests that she should have an abortion.

9                   THE COURT: All right.

10                  MS. HOLMES: In closing --

11                  THE COURT: So, I'm sorry, just again,  
12 because I know you have them, what were the dates -- so  
13 Exhibit 5 was one video. What was the date of that  
14 video?

15                  MS. HOLMES: Your Honor, let me -- Court's  
16 indulgence. I have the website.

17                  THE COURT: Do you have the date of the  
18 video on the video itself?

19                  MS. HOLMES: Your Honor, I believe there  
20 is a date. It might be the date that I downloaded and  
21 saved them to the USB drive, but it might not be the date  
22 they were posted.

23                  So I'm going to find the links. And I can

1 also present that to the Court, the video links to access  
2 them. But --

3 THE COURT: Well, that was all put into  
4 evidence, and I didn't allow Mr. Goodman to access the  
5 Internet. So if you don't have the video itself, the  
6 dates, I guess I'll just go from there.

7 MS. HOLMES: Okay. But, yes, those were  
8 all posted prior to the protective order being in place,  
9 and they are all still readily available online.

10 Does Your Honor have any more questions?

11 THE COURT: No, go ahead.

12 MS. HOLMES: Okay. In closing, Your  
13 Honor, Ms. Jankowicz requests the protective order stay  
14 in place. Post February 14th, the harassment has  
15 stopped. Mr. Goodman has stopped contacting Ms.  
16 Jankowicz. He has stopped calling her. He has stopped  
17 posting related to her specifically. He has alluded, but  
18 he has not posted directly, which is what she is  
19 requesting.

20 She is requesting that the stalking stop.  
21 She is requesting that the threats against her and her  
22 family and the alleged threats that are being released  
23 online stop. Thank Your Honor.

1                   THE COURT: All right, Mr. Goodman.

2                   MR. GOODMAN: Your Honor, in her role as  
3 the Executive Director of the Disinformation Governance  
4 Board, Ms. Jankowicz announced that she would be deciding  
5 what First Amendment protected speech from American  
6 citizens would be determined lawful but awful. We never  
7 got to hear the process by which Ms. Jankowicz would  
8 determine the falsity of any particular information that  
9 would allow her to define it as disinformation, and from  
10 what she said, it seems like anything she disapproves of  
11 is disinformation, and we have seen that here today.

12                  She doesn't like the information that I  
13 have found and shared about her, so she deems it to be  
14 harassment and defamatory, although it does not meet the  
15 elements of any of these torts or criminal charges.

16                  THE COURT: Okay, well, I don't want to  
17 talk about what you said about her. I want to talk about  
18 what you said about her child. I want to talk about what  
19 you said about her husband, because you might have a  
20 right to say whatever you think you want to say about  
21 her, but I want to understand why you think you have any  
22 right to have made any of the statements about her child  
23 or her husband, and why that's not, what you did, a

1 violation of the Code of Virginia.

2 MR. GOODMAN: Well, first of all, most of  
3 the things that they've alleged that I have said are  
4 distortions of what was actually said. Secondarily, I  
5 had no knowledge that Ms. Jankowicz was expecting a child  
6 or had a child until she publicized that information.  
7 This is the way I've learned everything about Ms.  
8 Jankowicz.

9 She said that I was searching for  
10 information about her husband. That's false. The only  
11 time I looked for information about her husband was in  
12 that first video, and you will notice that I said he is a  
13 virtual ghost, because he had removed all that  
14 information before I got involved with this.

15 The fact of the matter is, Ms. Jankowicz  
16 went on national television announcing her role as this  
17 person who is going to decimate the First Amendment of  
18 the Constitution, and it wasn't just me. Most people  
19 bristled at this. That is in part why the Disinformation  
20 Governance Board was dissolved.

21 However, the time proximity with which  
22 that happened relative to me exposing facts that caused  
23 me to believe that Ms. Jankowicz should be registered

1 under 22USC611, Foreign Agent Registration Act, when I  
2 published that information --

3 THE COURT: Okay, sir, again, I asked you  
4 --

5 MR. GOODMAN: Because I was investigating  
6 --

7 THE COURT: -- to talk about the  
8 statements with respect to her child and her husband. I  
9 don't need to get into your whole investigation --

10 MR. GOODMAN: I never incited any  
11 violence. All I said was I doubted the existence of the  
12 husband because I couldn't see any evidence that she was  
13 married. And what I did see was evidence that Ms.  
14 Jankowicz was in Ukraine in February and March of 2014,  
15 when a violent coup occurred, and people were killed.

16 And what I didn't share with you today is  
17 evidence of a --

18 THE COURT: Well, then it's not in front  
19 of me today. I don't want to hear it, sir.

20 MR. GOODMAN: I saw evidence in the public  
21 domain that caused me to believe that Ms. Jankowicz was  
22 involved in very serious crimes. And we have a war going  
23 on in Ukraine right now. And when I started to look into

1       this evidence, rather than getting sued for defamation or  
2       warned to remove these statements, or I would be sued for  
3       defamation, Ms. Jankowicz proceeded to make false  
4       statements to the Court, false statements to the police.

5                  She previously said I -- the judge got  
6       very angry in the last session because Ms. Jankowicz said  
7       that I had said that her baby should go to baby jail, and  
8       when asked if I had said that, I said I don't recall  
9       saying that, and I don't think baby jail is a real thing,  
10      and I don't think that is something I would have said.

11                 So the point is I never told anyone to  
12      take any action whatsoever against Ms. Jankowicz. This  
13      name of the person who she said threatened her, that's  
14      the first time I've ever heard that name. I don't know  
15      that person. I don't interact with that person. I can't  
16      be held responsible for people do and say when they see  
17      news reports that I put out.

18                 And to the extent that I say her child is  
19      a demon spawn or whatever that is that they claim that I  
20      said, I think the people who are involved in efforts that  
21      result in wars that kill hundreds of thousands of people  
22      and threaten this country should be in jail. And I think  
23      that I am allowed to criticize them within the context of

1 the First Amendment.

2 I don't want anyone to harm Ms. Jankowicz.  
3 I want her to be brought up on criminal charges, and  
4 that's what I've said. To the extent that I have doubted  
5 the existence of the husband or the child, I didn't tell  
6 her to post things on the Internet telling people that  
7 she was pregnant or having a child. I didn't tell her to  
8 post a picture of her child's head. She is provoking  
9 this curiosity about herself and her family.

10 And I didn't tell her to violate the First  
11 Amendment of the Constitution. Banned.Video is Alex  
12 Jones. I can't control what Alex Jones does, and I  
13 believe they saw the video and thought it was informative  
14 and important. It certainly -- I mean, Ms. Jankowicz  
15 today is registered under FARA, and if you read the FARA  
16 statute, it says the purpose of asking foreign agents to  
17 register is specifically so that citizens of the United  
18 States can monitor the activities of foreign agents in  
19 the United States.

20 Ms. Jankowicz is a registered foreign  
21 agent. She left the employ of the United States  
22 Government immediately after I identified that she should  
23 be a registered foreign agent, and I alleged that she has

1 made these false statements here to the Court and to the  
2 police to stifle my First Amendment rights and to prevent  
3 me from reporting to the public facts and information  
4 that are unfavorable to Ms. Jankowicz. And that is why  
5 she wants a protective order preventing me from speaking  
6 about her on social media.

7                   Thank you, Your Honor.

8                   THE COURT: Thank you, sir. Anything  
9 else, Counsel?

10                  MS. HOLMES: Your Honor, I just want to  
11 reiterate that Ms. Jankowicz requests that the protective  
12 order is upheld due to Mr. Goodman's continued and  
13 repeated harassment of her and investigation that he has  
14 said even in his closing that he will not stop. He  
15 believes that this is his right.

16                  Ms. Jankowicz is not attempting to violate  
17 his Constitutional right to post online. She asked that  
18 he does not post her name or her husband's or her  
19 child's. She's asking for protection limited to her  
20 person, and she is no longer in a position of political  
21 importance where she is considered a public figure.  
22 Thank you.

23                  THE COURT: All right, well, during the

1 break, the Court had the opportunity to take a look at  
2 Virginia Code 19.2-152.7:1, which defines for purpose of  
3 protective orders act of violence, force, or threat, and  
4 that Code section says it means any act involving  
5 violence, force, or threat that results in bodily injury  
6 or places one in reasonable apprehension of death, sexual  
7 assault, or bodily injury.

8 Such act includes but is not limited to  
9 any forcible detention, stalking, criminal sexual assault  
10 in violation of chapter four, or any criminal offense  
11 that results in bodily injury or places one in reasonable  
12 apprehension of death, sexual assault, or bodily injury.

13 So that is the definition of what is  
14 considered conduct under the protective order statute.  
15 Virginia Code 18.2-60.3 defines stalking, and it defines  
16 stalking as any person, with certain exceptions, which I  
17 do not believe Mr. Goodman falls into, who on more than  
18 one occasion engages in conduct directed at another  
19 person with the intent to place, or when he knows or  
20 reasonably should know that the contact places that other  
21 person in reasonable fear of death, criminal sexual  
22 assault, or bodily injury to that other person, or to  
23 that other person's family or household members.

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1                   The Court has heard evidence that was  
2 admitted without objection, including what is set forth  
3 in the demonstrative Exhibit Number 9, that in one video,  
4 Mr. Goodman stated I'm convinced this woman has criminal  
5 conflicts of interest, and they need to come out, and I  
6 hope she gets prosecuted, and her and her baby in jail.  
7 Then he says, well, the baby doesn't have to go to jail.  
8 Put her in jail before she has the baby. That will be  
9 pleasant for her.

10                  On another occasion, he has a video that  
11 says doesn't the baby need attention. Why doesn't she  
12 get an abortion. And then on another occasion -- oh,  
13 then in that same video, he says she needs to be shunned  
14 from society, and I'm sad to know that she's reproducing  
15 more assholes in the world.

16                  And then in a different video says where  
17 is the demon spawn, relating to the baby. It should pop  
18 out soon. I'm disappointed when losers and criminals  
19 procreate.

20                  Mr. Goodman stated that he was aware that  
21 he put out a video that had personal information of Ms.  
22 Jankowicz in the video, and that while he took actions to  
23 take that down, that that video is still listed on the

1 Internet with her personal information in it, and in  
2 addition, it has been represented that the videos that  
3 have been admitted into evidence and to which these  
4 quotes were taken, are all still on the Internet and are  
5 all still accessible.

6                   While Ms. Jankowicz may at the time have  
7 been a public figure, her unborn child, Mr. Goodman,  
8 certainly was not, and neither is her child since it has  
9 been born. And when you went after the child publicly  
10 and incited people to take action against the child,  
11 which the Court finds that these quotes do by calling the  
12 child a demon, by saying it should be aborted, by saying  
13 it should be in jail, and then when you say yourself you  
14 have no control over what the people who read your  
15 content do, that clearly falls into a category where Ms.  
16 Jankowicz could reasonably be in fear that her child and  
17 her family were in danger from the comments that you  
18 posted.

19                   And perhaps that wasn't your intent.  
20 Perhaps you thought you were just making perfectly  
21 appropriate comments, but you crossed the line, the First  
22 Amendment line when you did that. And the Court finds  
23 absolutely the evidence is sufficient to find that she

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1 was in reasonable fear of harm to her child and to her  
2 family with respect to 18.2-60.3.

3                   And since stalking is a basis for a threat  
4 of violence under a protective order as a basis for a  
5 protective order, the Court finds that she has met her  
6 burden for a protective order, and will go ahead and  
7 grant the protective order, and order that you need to  
8 stay away from her. You need to stay away from her  
9 family.

10                  You are not to have any contact with them  
11 directly or indirectly. And you are not to post anything  
12 on social media about them.

13                  And I certainly understand your First  
14 Amendment rights, and you have a right to say what you  
15 want within the confines of that, but I think you clearly  
16 crossed the line when you made these particular comments  
17 and put them out and left them out there when your own  
18 testimony is that you have no control over what your  
19 supporters might do based on what they read.

20                  And I think that given all of the  
21 testimony, and given Ms. Jankowicz's testimony that she  
22 is in fear, and that, in fact, she is afraid to go out in  
23 public with her child, she's afraid to go out and walk

1       her dog because of what you have put out there, the  
2 standard has been met. So I'm going to go ahead and  
3 enter a permanent protective order in the case. And you  
4 can certainly note your appeal. All right.

5                    MR. GOODMAN: Am I to say something, or --

6                    THE COURT: That is my ruling. So I will  
7 go ahead and -- I think there's a document that I need to  
8 fill out. I don't know if the Clerk fills it out, and  
9 then the Deputy will need to serve that, but that is the  
10 Court's ruling in the case.

11                  You can fight it out in court all you  
12 want.

13                  MR. GOODMAN: I will.

14                  THE COURT: You have all kinds of rights  
15 to fight it out in court with respect to what your  
16 beliefs are and what the evidence is. But I think in  
17 terms of the way that this has been handled, it violates  
18 that law.

19                  MR. GOODMAN: False statements to the  
20 police don't violate the law?

21                  THE COURT: I've made my ruling, sir.

22                  MR. GOODMAN: Thank you, Your Honor.

23                  THE COURT: I'm going to go ahead and fill

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1 that out. I'll come back and bring it so the Deputy can  
2 serve it. All right. So if everyone would just stay for  
3 a moment.

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5 (Whereupon, at approximately 12:35 p.m.,  
6 the hearing in the above-entitled matter was concluded.)

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1 CERTIFICATE OF REPORTER  
2

3 I, COLLEEN M. VANCE, a Certified Verbatim  
4 Reporter, do hereby certify that the foregoing  
5 proceedings were taken by me and thereafter reduced to  
6 typewritten form, that the foregoing are true and correct  
7 to the best of my knowledge and ability; and that I have  
8 no interest in said proceedings, financial or otherwise,  
9 nor through relationship with any of the parties in  
10 interest or their counsel.

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Colleen M. Vance, CVR-CM-M  
Certified Verbatim Reporter

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